



October 2009

Integrated Impact Assessment Full Report

Consultation draft replacement London Plan
(Spatial Development Strategy for Greater London)

MAYOR OF LONDON



October 2009

Integrated Impact Assessment

Full Report

Consultation draft replacement London Plan
(Spatial Development Strategy for Greater London)

**Greater London Authority
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Entec UK Limited, in association with Ben Cave Associates and Zahno Rao, were commissioned by the Greater London Authority to undertake an independent Integrated Impact Assessment as an iterative process during the development of the draft replacement London Plan. This document constitutes the Sustainability Appraisal / Strategic Environment Assessment of the draft replacement plan, and therefore represents the views of Entec UK Limited and not necessarily those of the Greater London Authority or the Mayor of London.

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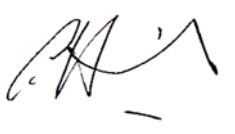
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Non-Technical Summary

This is the Non-Technical Summary of the Integrated Impact Assessment (IIA) Report which documents the assessment of the environmental, social and economic performance of the draft replacement London Plan against a set of objectives. The approach employed in the IIA fulfils the requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) and considers a range of issues including health, well-being, community safety and equality. This approach avoids the need to undertake and report on separate assessments and seeks to reduce any duplication of assessment work.

The following sections explain what the draft replacement London Plan is, provides an outline of its content and the methodology used to assess it. The IIA report has been published alongside the draft replacement plan for public consultation. For details on how to give your views, please see **Section 1.3.1** (page 3) in the main report.

1. What is the replacement London Plan?

The London Plan is one of the Mayoral strategies which is required under the Greater London Authority Act 1999 (with amendments made by the GLA Act 2007). The London Plan deals with matters of strategic importance to Greater London and Local Development Frameworks (LDFs) produced by the London boroughs are required to be 'in general conformity' with it.

The London Plan was first published in 2004 and has been subject to two formal alterations processes. A consolidated version of the plan was published in February 2008 which includes these alterations. A third alteration is currently underway that addresses policy to support the funding of the Crossrail project. Although kept up to date, the basis of the Plan and the majority of policies within it date back to the first document. Following the election of a new Mayor, *Planning for a Better London* (2008) was published setting out his approach to planning in the capital and asking for comments. It proposed making further minor alterations prior to a comprehensive review. However, feedback from the consultation highlighted that it would make more sense to have a full review which would reduce the uncertainty faced by boroughs in drawing up their LDFs. A full review would also help the Plan respond to new challenges, primarily from a growing, and increasingly diverse, population, a more competitive global business environment and a changing climate.

The Mayor agreed that setting a clear spatial policy direction as early as possible would not be possible with further alterations and subsequently announced a full review of the London Plan in December 2008. As a result of the review the draft replacement London Plan was produced. It has been designed to be shorter, more strategic and more user friendly, and will have a planning horizon up to 2031. The draft replacement plan arranges policies within thematic chapters, which address key strategic issues. The chapters are:

- **Context and Strategy** – This chapter presents the vision for London and sets the context for the wider plan and its policies;

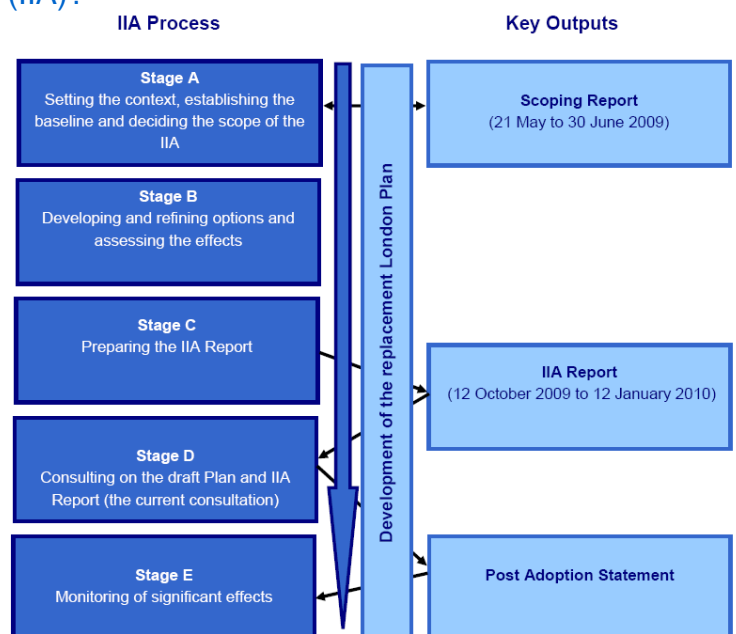
- **London's Places** – This chapter includes policies on the broad development strategy, the 2012 Games and their legacy, the sub regions, outer/inner/central London, town centres and opportunity/intensification/ regeneration areas;
- **London's People** – This chapter includes policies to addresses housing issues and associated social infrastructure to meet the needs of a growing population;
- **London's Economy** – This chapter includes policies that seeks to ensure that London remains competitive within a global context by providing the necessary infrastructure to support economic activity;
- **London's Response to Climate Change** – This chapter includes policies to address issues such as energy efficiency, water quality and resources and waste management;
- **London's Transport** – This chapter includes policies to provide London with an adequate capacity and transport infrastructure to meet the demands of population growth and to make opportunities more accessible;
- **London's Living Places and Spaces** – This chapter includes policies which seek to protect what is valued and distinctive about London and its neighbourhoods, including environment and heritage, green and open spaces, and the Blue Ribbon Network;
- **Implementation, Monitoring and Review** – This chapter sets out the policies to ensure the implementation of the London Plan is effective at achieving the vision.

The Mayor's Economic Development Strategy (EDS) and the Mayor's Transport Strategy (MTS) have also been reviewed at the same time which provided the opportunity to fully align the strategies.

2. What is an Integrated Impact Assessment (IIA)?

The IIA fulfils the requirements for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) (in a manner that incorporates the requirements of the European Union's SEA Directive (2001/42/EU) and the transposing UK Regulations). The approach also fulfils the requirements for Health Impact Assessment, Equalities Impact Assessment and Community Safety Impact Assessment. This approach avoids the need to undertake and report on separate assessments, seeks to reduce any duplication of assessment work and benefits from a shared understanding of the policies.

The figure shows an overview of the key stages of the IIA process (which are based on Government guidance on Sustainability Appraisal (ODPM, 2005)). The IIA Scoping Report (that reflected the completion of Stage A) was subject to consultation with the statutory SEA consultees and other stakeholders in May and June. Responses to this report have been reflected in this IIA Report.



The consultation on this IIA Report is indicated as Stage D in the diagram and follows the iterative assessment of effects and the preparation of this report.

3. How was the Draft Replacement London Plan Assessed?

The assessment of the draft replacement plan been undertaken using an objectives-led approach. The IIA objectives (illustrated below) have been informed by the baseline evidence, the consideration of the key sustainability issues for London, the review of plans and programmes and the comments received during the consultation of the IIA Scoping Report. They have also built upon objectives identified within previous IIAs. Broadly, the objectives present the preferred environmental, social or economic outcome which typically involves minimising detrimental effects and enhancing positive effects. They have been formulated to allow for a comprehensive assessment of the key effects of the implementation of the replacement London Plan by covering the relevant environmental, social and economic aspects.

IIA Objectives	
1. Regeneration & Land-Use.	To stimulate regeneration and urban renaissance that maximises benefits the most deprived areas and communities.
2. Biodiversity.	To protect, enhance and promote the natural biodiversity of London.
3. Health and Well-being.	To maximise the health and well-being of the population and reduce inequalities in health.
4. Equalities.	To ensure equitable outcomes for all communities, particularly those most at risk to experience discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London.
5. Housing.	To ensure that all Londoners have access to good quality, well-located, affordable housing.
6. Employment.	To offer everyone the opportunity for rewarding, well-located and satisfying employment.
7. Stable Economy.	To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.
8. Flood Risk and Climate Change Adaptation.	To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.
9. Climate Change Mitigation and Energy.	To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.
10. Water Quality & Water Resources.	To protect and enhance London's waterbodies and the Blue Ribbon Network.
11. Waste.	To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.
12. Accessibility and Mobility.	To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).
13. Built and Historic Environment.	To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces are appropriately designed.
14. Liveability and Place.	To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.
15. Open Space.	To protect and enhance natural open space in London.
16. Air Quality.	To improve London's air quality.

Each objective is supported by a series of guide questions (see **Table 3.3**, page 15). The IIA objectives cover all of the topics that the assessment is required to include information on (including those set out in the SEA Directive). In addition, Government guidance on Sustainability Appraisal (ODPM, 2005) indicates that the process should also cover social and economic issues such as economy, society, education, skills, transport, equality and diversity. This also reflects the requirement of the Government Office for London Circular 1/2008 to have regard to:

- the effect on the health and health inequality of persons in Greater London;
- the effect on climate change, and the consequences of climate change; and
- the achievement of sustainable development in the United Kingdom.

The IIA identifies and assesses those effects arising from the draft replacement London Plan. Specifically, the IIA considers the extent to which the Plan contributes towards achieving the IIA objectives when considered against the baseline. The ‘guide questions’ have been used to assist the assessment of the potential effects in a qualitative manner, ensuring consideration is given to relevant influencing factors. The direct, indirect and cumulative effects have also been considered.

4. What strategic options were considered?

Three strategic spatial development options were developed and considered in the London Plan Review process to help guide policy development. They were developed in response to concerns regarding the existing London Plan’s focus on outer London and the work of the Mayor’s Outer London Commission. The strategic options were:

- **Strategic Spatial Development Option 1:** No change, current London Plan direction
- **Strategic Spatial Development Option 2:** Current London Plan direction plus enhanced growth in metropolitan town centres
- **Strategic Spatial Development Option 3:** Current London Plan direction plus enhanced growth in four new Strategic Outer London Development Centres

The assessment highlights that generally, Option 2 is likely to contribute most towards meeting the IIA objectives, and that other aspects of the options have merit. The policies in Chapter 2 of the draft replacement London Plan take on board the benefits of each of the distinct options presented and express these as the preferred spatial development options for London’s growth. This represents a development of the options emphasising the importance of metropolitan and other town centres as development locations, while also recognising a role for other strategic development centres able to support new activities and sectors in outer London. This approach addresses the concerns and issues raised in this assessment.

Three options relating to strategic housing targets were also assessed in the IIA. They are:

- **Housing Option 1:** Current Plan Housing Target – 30,500 homes

- **Housing Option 2:** Increased Housing Target – 33,380 homes
- **Housing Option 3:** Increased Housing Provision – 41,154 homes

The assessment of the strategic housing target options highlights that Option 2 is likely to be most sustainable as it provides the enhanced benefits arising from additional housing beyond that of Option 1, without the exacerbated effects (such as increased land use pressure, and potentially aggregate waste generation, emissions and water consumption) associated with the greater provision of housing and higher densities associated with Option 3. The increased housing target of 33,380 was also derived from the latest London Strategic Housing and Land Availability Assessment and is the preferred housing target which has been taken forward into the draft replacement plan.

5. What were the key effects of the draft replacement London Plan?

Entec provided ongoing commentary on the sustainability (including, health, equality and community safety) effects of the emerging replacement plan (**Appendix E** identifies how these comments were considered). Overall, the assessment of the draft replacement London Plan has found it to be broadly positive when considered against the IIA objectives. The draft replacement London Plan also builds upon the positive aspects of the existing Plan. Some of the key strengths of the Plan include:

- A commitment and focus on quality of life – including promoting quality of life in outer London for present and future residents and enhancing local economic opportunities and transport requirements;
- Addressing the concentration of deprivation within inner London and improving the quality of life for those living, working, studying or visiting there;
- Setting out a comprehensive range of policies on climate change mitigation and adaptation (which will help to reduce carbon dioxide emissions, minimise overheating, reduce flood risk, improve water efficiency and enhance green infrastructure);
- Strong support for economic growth that contributes positively to quality of life but without having an unacceptable impact on the environment or encroaching on the Green Belt;
- Strong emphasis on the importance of enterprise and innovation;
- A focus on the protection of heritage, landscape character and strategic views;
- A strong encouragement for people to walk, cycle and to use more sustainable modes of travel - including more widespread use of electric vehicles;
- Greater emphasis on higher quality design of new homes; and
- Building neighbourhoods and communities that are strong, secure, and accessible (for example, with an emphasis on safety and security, planting more trees and enhancing the public realm).

However, the effects arising from large development projects in London (for example, large residential schemes) may be positive or negative. These effects may occur as a result of individual developments or cumulatively alongside other developments. The negative effects may include added strain on natural resources (e.g. water resources), pressure to build in areas of high flood risk and an increase in the volume of municipal waste. However, the Plan contains policies to mitigate such effects at the strategic level (e.g. Policy 5.3: Sustainable design and construction; Policy 5.12: Flood Risk Management; and Policy: 5.16 Waste self-sufficiency). Furthermore, localised impacts will also be considered through LDFs, Area Action Plans (AAPs), Development Briefs and through the Environmental Impact Assessment (EIA) process. Consequently, so far as the London Plan can influence, no significant detrimental effects are anticipated to occur as a result of this draft replacement plan. However, given the level of uncertainty in how some policies will be implemented on the ground it is important to develop an effective monitoring regime to review the impacts and effectiveness of policy over time.

6. How will any effects be monitored?

A set of 24 key performance indicators (KPIs) are listed in the draft replacement Plan (Table 8.1), these will be monitored by the AMR, published each February. The KPIs listed in the Plan are identified in **Table 12.1** (page 145) of the main report. Monitoring is also undertaken by the London Sustainable Development Commission (LSDC) which may complement these indicators. The quality of life indicators monitored by the LSDC are also identified in **Table 12.1**. The indicators are grouped alongside the IIA objectives to illustrate their breadth of coverage. These indicators will help monitor the environmental, social and economic effects of the Plan. These measures will be confirmed following consultation on the draft.

7. What are the next steps?

This IIA Report is issued for consultation alongside the draft replacement London Plan. Consultation will last for 12 weeks from 12th October 2009 to 12th January 2010. Following receipt of comments on the draft replacement Plan and the IIA Report, an Examination in Public (EIP) will be carried out in summer 2010. The EIP will make recommendations to the Mayor in early 2011. Following consideration of these recommendations, the Mayor will inform the Government Office for London that he intends to publish the new replacement London Plan which is anticipated to be adopted before the end of 2011.

8. How do I provide comments on the IIA?

All responses on the draft replacement London Plan and/or the IIA Report must be received by **5pm on Tuesday 12 January 2010**. Details of how to respond are identified in **Section 1.3.1** (page 3).

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Appendix A	List of Abbreviations
Appendix B	Health Impact Assessment
Appendix C	Equalities Impact Assessment
Appendix D	Community Safety Impact Assessment
Appendix E	Iterative Comments and Responses
Appendix F	Quality Assurance Checklist

The following appendices are available online at www.london.gov.uk.

Appendix G	Reviewed Plans and Programmes
Appendix H	Signpost to Additional Baseline Information
Appendix I	Assessment Matrix
Appendix J	Cumulative Effects Assessment

1. Introduction

1.1 Integrated Impact Assessment

Entec UK Ltd has been appointed to undertake an **Integrated Impact Assessment (IIA)** of the Spatial Development Strategy for London (known as the London Plan). The Greater London Authority (GLA) is responsible for preparing and (from time to time) reviewing the London Plan which provides the statutory planning framework to guide London's future development. In December 2008, the Mayor of London announced that a full review of the London Plan would be undertaken leading to the adoption of a replacement London Plan before the end of 2011.

This IIA Report presents an assessment of the environmental, social and economic performance of the draft replacement London Plan against a set of objectives. This report follows consultation on a Scoping Report which set out the proposed approach to the IIA. A scoping workshop was held during the consultation period (2nd June 2009) to provide consultees with additional information on the scope of the IIA. Comments received during the workshop and following the end of the consultation period were considered and taken into account as Entec and the GLA finalised the approach to this IIA.

The approach employed in the IIA fulfils the requirements for Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA) and Community Safety Impact Assessment (CsIA). This approach avoids the need to undertake and report on separate assessments, seeks to reduce any duplication of assessment work and benefits from a shared understanding of policies.

1.1.1 The Requirement for Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

An SA (incorporating SEA) of the London Plan is required by the Government Office for London Circular 1/2008, which states (in Section 3.6) that:

'The sustainability appraisal, incorporating SEA, of the SDS should allow for a systematic and iterative testing of the emerging proposals.'

and:

'The precise form of the appraisal is a matter for the Mayor. However, he or she should have regard to current Government guidance on good practice for sustainability appraisals, for example in PPS11, PPS12, any revisions to these and Sustainability Appraisal of Regional Spatial Strategies and Local Development Frameworks (ODPM 2005).'

The Circular also states that:

‘The approach to these assessments [SEA and SA] should take account of relevant guidance. Assessment[s] should be proportionate, taking into account the scale and extent of the alterations or review proposed. It should build on previous assessments that have been undertaken’.

The Crime and Disorder Act (1998) and the Police and Justice Act (2006) also place a duty on the Mayor to give consideration to community safety. Consequently, a Health Impact Assessment (HIA), Equalities Impact Assessment (EqIA) and a Community Safety Impact Assessment (CsIA) will be undertaken as part of the Sustainability Appraisal/Strategic Environmental Assessment of the London Plan. Rather than produce many separate reports these elements have been integrated into this single Integrated Impact Assessment (IIA). It is this integrated approach which has been undertaken for the ‘early alterations’ to the London Plan addressing housing, waste and minerals in 2005/2006, the ‘further alterations’ published in October 2007, and the Crossrail alterations published in 2009. The assessment of health, equality and community safety effects was undertaken as an integral part of the IIA process (for example, using the same IIA Objectives). However, separate commentaries on the effects were produced and can be found in **Appendix B, C and D**.

1.2 Purpose of Report

The purpose of this IIA Report is to present the findings of the impact assessment of the draft replacement London Plan against a range of social, economic and environmental objectives. This report is structured as follows:

- Section 1** **Introduction:** An introduction to the IIA and consultation arrangements is presented in this section.
- Section 2** **Overview of the London Plan Review:** The context of the IIA, including an overview of the London Plan review process.
- Section 3** **Methodology:** This section presents the baseline evidence (including the review of plans and programmes) and the objectives used in the IIA. It also provides information on the assessments’ assumptions and the separate Habitats Regulations Assessment.
- Sections 4-11** **Assessment:** The assessment of the policies in the draft replacement London Plan (including, where relevant the assessment of any reasonable alternatives).
- Section 12** **Conclusions and Recommendations:** The key findings of the assessment are presented. A framework for monitoring significant effects is also proposed.

1.3 Consultation and Stakeholder Engagement

Consultation and stakeholder engagement are fundamental to the IIA process and reflects the principle that the development of plans is better where it is transparent, inclusive and uses information that has been subject to public scrutiny. The IIA process aims to ensure that the key stakeholders, those parties who could be affected and the

wider public have the opportunity to present their views on the findings of the assessment. At the scoping stage, consultation responses were sought from statutory consultees identified in the SEA regulations, as well as other non-statutory consultees including Transport for London (TfL), London Fire Emergency Planning Authority (LFEPA), London Development Agency (LDA), Metropolitan Police Authority (MPA), London Councils and other relevant departments within the GLA.

1.3.1 Consultation on this IIA

This IIA Report is being issued for public consultation alongside the draft replacement London Plan. In addition to seeking views from statutory consultees, this IIA Report is available to all organisations/individuals that have an interest in the draft replacement London Plan and responses are welcome. The consultation period will run for 12 weeks from **12 October 2009** to **12 January 2010**.

How to give your views

All responses on the draft replacement London Plan and/or the IIA Report must be received by **5pm on Tuesday 12 January 2010**. They should be sent to:

Boris Johnson
Mayor of London
(Replacement London Plan)
Greater London Authority
FREEPOST LON15799
London SE1 2BR

Or by email to mayor@london.gov.uk with '**Replacement London Plan**' as the title.

Please note, if you send in a response by email it is not necessary for you also to send in a hard copy. If your response only covers the IIA Report please make this clear in the subject line of your response. All responses will be made available for public inspection.

2. Overview of the London Plan Review

2.1 Introduction

This section provides an overview of the London Plan review. It highlights the need for a review of the existing London Plan (**Section 2.2**) and how that process has been undertaken. It also provides a summary of the structure of the draft replacement London Plan highlighting the thematic coverage (**Section 2.3**).

2.2 The need for a Review

Strategic planning for London is the shared responsibility of the Mayor of London and the London boroughs. Under the Greater London Authority Act (1999) the Mayor of London is required to produce a spatial development strategy that deals with matters that are of strategic importance to Greater London. The Mayor is required to consult on the strategy (known as the London Plan) enabling public participation in its development. The Greater London Authority Act 2007 made amendments to the GLA Act 1999 to ensure that the Mayor has regard to any comments submitted to him in response by the Assembly or any of the functional bodies.

The Mayor is required to review the spatial development strategy from time to time and may at any time prepare and publish a new strategy. Local Development Frameworks produced by boroughs are required to be ‘in general conformity’ with the London Plan.

The London Plan was first published in 2004 and has been subject to two formal alterations processes. A consolidated version of the plan was published in February 2008 which includes these alterations. A third alteration is currently underway that addresses policy to support the funding of the Crossrail project. Although kept up to date, the basis of the Plan and the majority of policies within it date back to the first document. Following the election of a new Mayor, *Planning for a Better London* (2008) was published setting out his approach to planning in the capital and asking for comments. It proposed making further minor alterations prior to a comprehensive review. However, feedback from the consultation highlighted that it would make more sense to have a full review which would reduce the uncertainty faced by boroughs in drawing up their Local Development Frameworks.

The Mayor agreed that setting a clear spatial policy direction as early as possible would not be possible with incremental further alterations and subsequently announced a full review of the London Plan in December 2008. This approach was considered important in ensuring consistency between the spatial, transport and economic development strategies (which are being reviewed at the same time). In April 2009 the Mayor published *A new plan for London* setting out his initial proposals for the replacement London Plan. Consultation on the proposals lasted until the end of June 2009, and the responses made informed the development of the draft replacement London Plan.

Overview of the draft Replacement London Plan

The draft replacement London Plan has been designed to be shorter, more strategic and more user friendly, and will have a planning horizon up to 2031. The draft replacement London Plan has arranged policies within thematic chapters, which highlight the main strategic issues addressed by the Plan. They chapters are:

- **Context and Strategy** – This chapter presents the vision for London and sets the context for the wider plan and its policies;
- **London's Places** – This chapter includes policies on the broad development strategy, the 2012 Games and their legacy, the sub regions, outer/inner/central London, town centres and opportunity/intensification/ regeneration areas;
- **London's People** – This chapter includes policies to addresses housing issues and associated social infrastructure to meet the needs of a growing population;
- **London's Economy** – This chapter includes policies that seeks to ensure that London remains competitive within a global context by providing the necessary infrastructure to support economic activity;
- **London's Response to Climate Change** – This chapter includes policies to address issues such as energy efficiency, water quality and resources and waste management;
- **London's Transport** – This chapter includes policies to provide London with an adequate capacity and transport infrastructure to meet the demands of population growth and to make opportunities more accessible;
- **London's Living Places and Spaces** – This chapter includes policies which seek to protect what is valued and distinctive about London and its neighbourhoods, including environment and heritage, green and open spaces, and the Blue Ribbon Network; and
- **Implementation, Monitoring and Review** – This chapter sets out the policies to ensure the implementation of the London Plan is effective at achieving the vision.

Chapter 1 sets out the Mayor's vision for London, which is that:

'Over the years to 2031 – and beyond, London should: excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change.

Achieving this vision will mean making sure London makes the most of the benefits of the energy, dynamism and diversity that characterise the city and its people; embraces change while promoting its heritage, neighbourhoods and identity; and values responsibility, compassion and citizenship.'

The vision is supported by six objectives. The Mayor's six objectives are to ensure that London is:

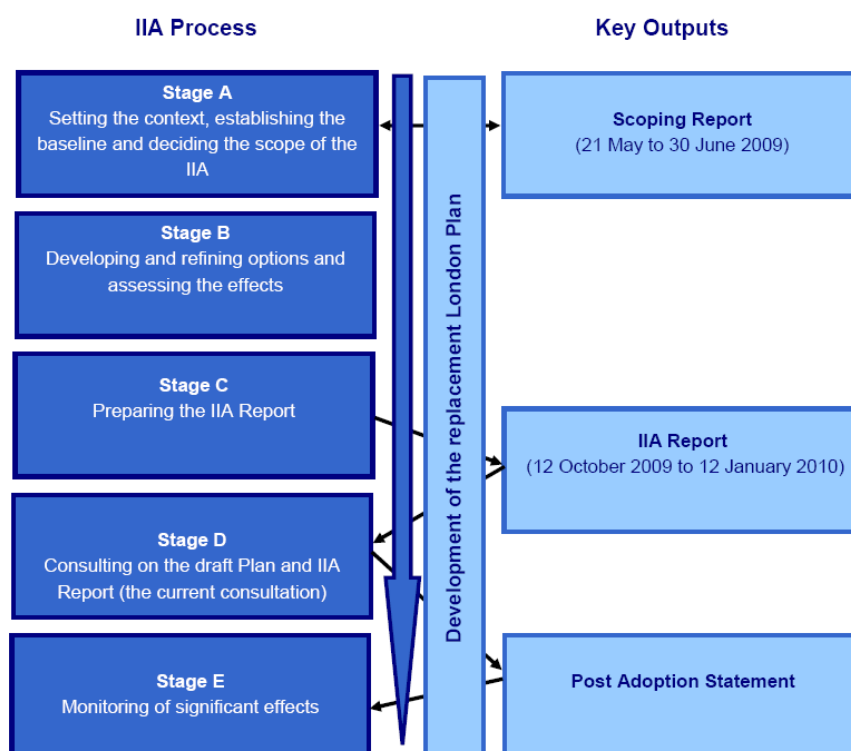
1. A city that meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life for all Londoners and helps tackle the huge issue of inequality among Londoners, including inequality in health outcomes.
2. An internationally competitive and successful city with a strong and diverse economy and an entrepreneurial spirit that benefit all Londoners and all parts of London; a city which is at the leading edge of innovation and research and which is comfortable with – and makes the most of- its rich heritage and cultural resources.
3. A city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached, which provide all of its residents, workers, visitors and students – whatever their origin, background, age or status – with opportunities to realise and express their potential and a high quality environment for individuals to enjoy, live together and thrive.
4. A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London's built heritage and which makes the most of and extends its wealth of open and green spaces and waterways, realising its potential for improving Londoners' health, welfare and development.
5. A city that becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy and consuming fewer resources and using them more effectively.
6. A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system which actively encourages more walking and cycling and makes better use of the Thames, and supports delivery of all the objectives of this Plan.

The Mayor's commitment to ensuring that all Londoners can enjoy a good, improving and sustainable quality of life now, over the period to 2031 and into the future, underpins the vision and objectives. The quality of life that Londoners experience is considered fundamental to how they feel about the city, and how it is perceived from the national and global context. Consequently, enhancing the quality of life is the underpinning theme that runs through all the chapters and policies.

3. Methodology

3.1 Introduction

The IIA Report provides an assessment of the draft replacement London Plan and its contribution towards achieving a range of environmental, economic, health, equality and other objectives. The approach adopted in this IIA Report in accordance with the requirements of SEA and has been expanded to include a wider range of issues normally found within a SA, as well as those relevant to HIA, EqIA, and CsIA. The approach is based on the five main stages of Sustainability Appraisal as identified in guidance issued by the ODPM (2005)¹ and is outlined in the diagram opposite. The first stage (Stage A) of the IIA process involves setting the context and establishing the baseline against which the alterations to the London Plan can be assessed. The key output of Stage A was the Scoping Report (which was subject to consultation with the statutory SEA consultees and other stakeholders from the 21st May to the 30th June 2009). Responses to this report have been reflected in this IIA Report. Stages B, C and D involve developing and refining options, assessing effects and preparing the IIA Report for consultation alongside the draft replacement London Plan (this consultation). The remaining stage (Stage E) involves monitoring the effects of the Plan (see **Section 12.2**).



This section sets out the methodology, including the scope of the assessment (**Section 3.2**), the method for collecting and presenting baseline (**Section 3.3**), the objectives and issues (**Section 3.3 and 3.4**), when the assessment was undertaken and by whom (**Section 3.6**), and assumptions and technical difficulties (**Section 3.7**). Information on the separate Habitats Regulations Assessment is also provided (**Section 3.8**).

¹ ODPM, November 2005 'Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents'.

3.2 Scope of the Assessment

3.2.1 Thematic Scope

The thematic topics which have been scoped in to this IIA Report have been informed by the topics identified in Annex I of the SEA Directive. **Table 3.1** highlights how the topics from the SEA Directive relate to the IIA objectives used within this assessment (and previously consulted upon in the IIA Scoping Report).

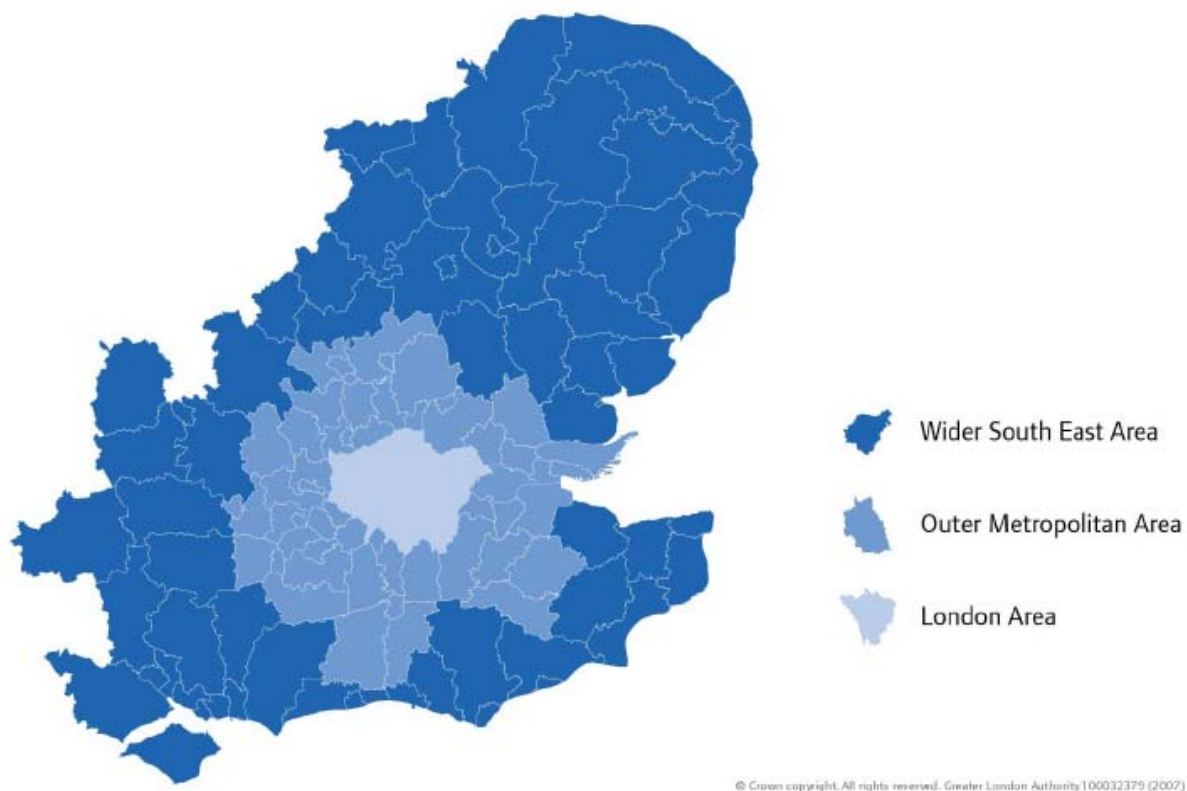
Table 3.1 Scope of the assessment topics

SEA Directive Topic	Scope in (✓) or out (x)	IIA Objective
Biodiversity	✓	2. Biodiversity
Population	✓	3. Health and Well-being; 4. Equalities; 5. Housing; 6. Employment; 7. Stable Economy; 11. Waste; 12. Accessibility and Mobility; 14. Liveability and Place
Human Health	✓	3. Health and Well-being; 4. Equalities; 5. Housing; 14. Liveability and Place
Fauna	✓	2. Biodiversity; 15. Open Space
Flora	✓	2. Biodiversity; 15. Open Space
Soil	✓	2. Biodiversity
Water	✓	2. Biodiversity; 10. Water Quality and Resources
Air	✓	16. Air Quality
Climatic Factors	✓	8. Climate Change Adaptation; 9. Climate Change Mitigation and Energy
Material Assets	✓	1. Regeneration & Land-Use; 5. Housing; 6. Employment; 7. Stable Economy; 9. Climate Change Mitigation and Energy; 11. Waste; 14. Liveability and Place
Cultural Heritage (including architectural and archaeological heritage)	✓	13. Built and Historic Environment; 14. Liveability and Place
Landscape	✓	2. Biodiversity; 13. Built and Historic Environment; 15. Open Space.

3.2.2 Geographic Scope

In general, the assessment will include any areas affected by the draft replacement London Plan within Greater London and, if appropriate, beyond the boundaries of Greater London into the neighbouring East of England and South East of England regions (for example, the outer metropolitan area and the interregional growth corridors), and the wider UK. London in the context of the wider South East area is shown in **Figure 3.1**.

Figure 3.1 London and the wider South East

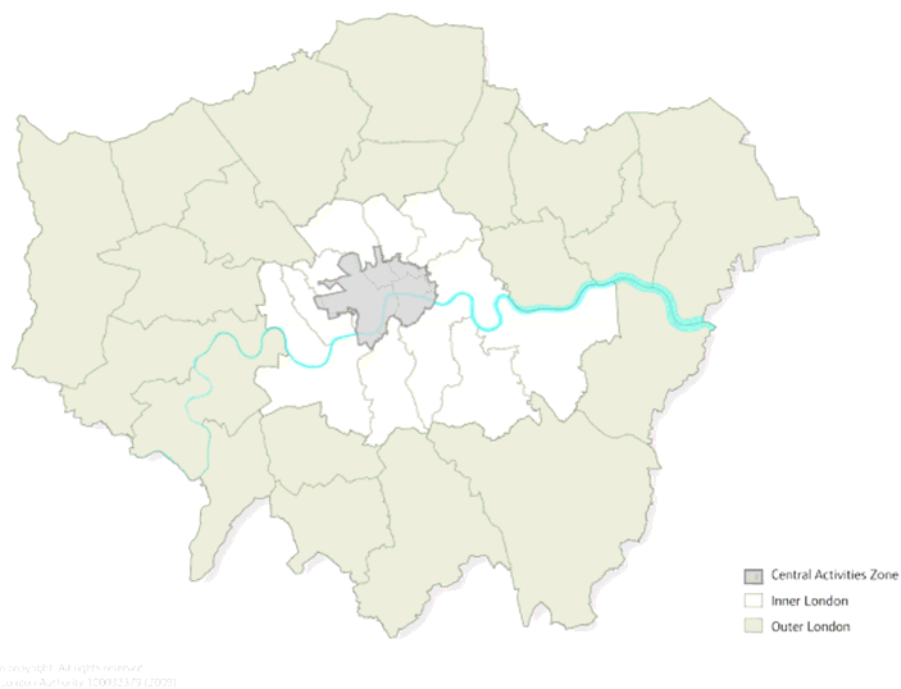


The key geographic areas within the Greater London boundary are defined by the individual London boroughs (depicted in **Figure 3.2**), and the areas of central, inner and outer London (depicted in **Figure 3.3**).

Figure 3.2 Greater London and London Boroughs



Figure 3.3 Central Activities Zone, Inner and Outer London



3.2.3 Temporal Scope

The effects of the policies associated with the London Plan may change over time (in the short, medium and long term) for a number of reasons. The temporal effects of the Plan have been considered in the assessment where relevant. For the purposes of the assessment the timescales may be defined as follows:

- **Short term:** This may be taken to refer to the effects that occur within the first five years of the implementation of the Plan;
- **Medium term:** This may be taken to refer to the effects occurring between five and 15 years following adoption of the Plan; and
- **Long term:** This may be taken to refer to the effects occurring beyond 15 years and which may arise beyond the Plan's specified lifetime (post 2031).

3.2.4 Links with previous IIAs

For consistency, the approach taken in this IIA builds on previous assessments undertaken for the *early alterations* to the London Plan (addressing housing, waste and minerals in 2005/2006), the *further alterations* (published in October 2007) and the *Crossrail Funding Alterations* (published in 2009). For example, the key sustainability issues and the IIA objectives set out in these previous assessments have been the starting point for scoping the framework for the IIA and updated where necessary.

3.3 Baseline

3.3.1 Review of Plans, Programmes and Strategies

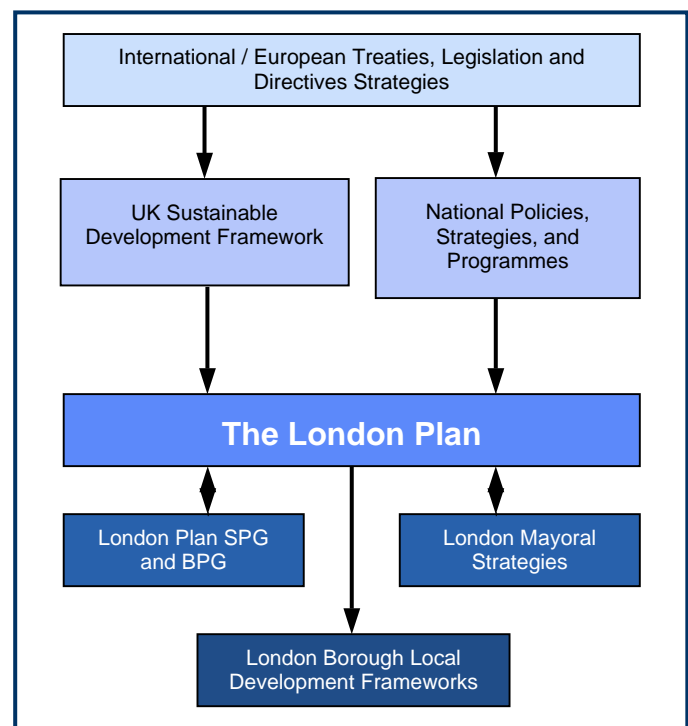
The SEA Directive requires a review of the plan's "*relationship with other relevant plans and programmes*". **Figure 3.4** highlights how the London Plan relates to the hierarchy of plans and programmes (including the two other Mayoral strategies being published alongside the London Plan, namely, the Economic Development Strategy and the Transport Strategy).

One of the first steps in undertaking the IIA is to identify and review other relevant policies, plans, programmes and strategies that are relevant to the London Plan. These may be documents from international, European or national origins.

Relevant documents to the London Plan were identified in the IIA Scoping Report. They were categorised by their relevance to the individual chapter themes of the London Plan (London's Places, London's People etc.) and are listed in **Appendix G** of this IIA Report (available on-line only).

The identification and review of plans and programmes has provided a useful source of information to support the environmental, social and economic evidence base, as well as for framing the IIA objectives that are used to test the plan.

Figure 3.4 Hierarchy of Plans and Programmes



3.3.2 Baseline Information and Key Issues

An essential part of the IIA process is to identify the current baseline environmental, economic and social conditions and where possible the likely evolution of these conditions following a 'business as usual' scenario (i.e. one in which there is no review or replacement of the London Plan). It is only with sufficient knowledge of the existing conditions that the key issues may be identified and addressed through the assessment process by providing the context for determining the contribution that the Plan may make towards the achievement of the objectives. The SEA regulations also require that the subsequent effects of the implementation of the draft replacement London Plan on the baseline are monitored.

Baseline evidence was presented for each of the proposed chapters of the draft replacement London Plan within the IIA Scoping Report. This evidence, along with other relevant information, has been included within the assessment chapters and where appropriate, has been reviewed and supplemented with additional information.

The key sustainability issues for London that have been identified are set out in **Table 3.2**. They have been informed by the review of plans and programmes (**Section 3.3.1**), the consideration of key baseline information (**Sections 4 to 11** and **Appendix H**), a review of the key issues identified in previous assessments for London and through consultation with statutory consultees. Therefore, these key sustainability issues represent a set of issues that has been refined over time during successive work on the London Plan. They include issues outlined below on equalities (E), health (D) and community safety (N), although it is recognised that these issues are all cross-cutting.

Table 3.2 Key Sustainability Issues for London

Key Sustainability Issues	
A. Development and Regeneration.	The sustainable development and regeneration of London, including addressing areas of deprivation and generating a lasting and sustainable legacy from the Olympic Games, particularly for East London communities.
B. Protecting Biodiversity.	Biodiversity needs to be conserved and enhanced across London (from the central urban core through suburbia to the surrounding green belt) in ways that restore and promote its ecological function.
C. Managing Continued Population Growth.	London's population is expected to continue to grow which means new homes jobs, and infrastructure need to be planned for in a sustainable way.
D. Improving and Protecting Health and Wellbeing.	Poor health outcomes and a widening disparity of relative wellbeing across London, and the relative impacts on the capacity of Londoners' to engage economically and socially.
E. Equalities.	The increasing disparity in quality of life across social groups and the impact of poverty on access to key social, environmental and economic infrastructure (for example: housing, transport, health care and education). There is also increasing polarisation of certain socio-economic groups within London.
F. Delivering Appropriate Housing.	Affordability, level of provision, quality, sustainable design and location of housing in London, and its impacts on access, mobility, sense of place and resource use.
G. The Changing Economy.	London will be impacted by the current global recession. London's unemployment rate has risen to 8%, the highest of any Government Office Region and the employment rate has remained on a downward trend over the last year. How London responds to the current recession will have long term impacts on the region and the UK.
H. London's World City Status.	The need to ensure London maintains its attractiveness to business and tourism to the benefit of all Londoners.
I. Responding to Climate Change.	London's impact on the global climate, and the threat of current and expected climate change on London's population, biodiversity, built and natural environment.
J. Protecting Water Quality and Resources.	Population growth, lifestyle choices and climate change are all placing increasing demands on London's water quality and supplies. At the same time existing water resources need to be managed more effectively.
K. Managing Waste.	Due to the volume of waste generated and put to landfill there is need for an integrated sustainable approach to managing waste in London, from reduction through to re-use, recycling and reprocessing.
L. Increasing Transport Accessibility.	The need to reduce congestion and increase accessibility for all Londoners. There is a continued emphasis on travel by car rather than more sustainable modes of transport such as public transport, walking and cycling. There is also a need to reduce emissions from vehicles (to be addressed in the Mayor's Transport Strategy).
M. Safeguarding (and enhancing) Heritage and the Historic Environment.	Due to competing land uses the quality of the cityscape and preservation of the historic environment may come under increasing pressure.

Key Sustainability Issues

- N. Promoting Safety and Security.** Levels of crime and perceptions of safety from the perceptions of crime and its relationship to sense of place and community.
- O. Improving Access to Nature and Open Space.** There is need to improve the public realm and increase people's opportunity for contact with nature and London's rivers and open spaces.
- P. Improving Air Quality.** London's air is still polluted and is the worst of any city in the UK and amongst the worst in Europe. The primary cause of poor air quality in London is emissions from road traffic, although emissions from residential and workplace heating are also substantial.

3.4 IIA Objectives

The establishment of appropriate objectives and indicative *guide questions* is central to the assessment process and provides a way in which the performance and effect of the London Plan can be identified and described. Using objectives ensures that each topic area required by the SEA regulations is addressed and provides a framework which guides the assessment in a consistent manner enabling the likely effects of the implementation of the London Plan to be identified.

This objective-led approach is considered to be more suited to assessing the draft replacement London Plan as it enables the appraisal to identify the extent to which policies within the Plan contribute toward the achievement of each objective, rather than if they will meet prescribed targets. It is therefore more qualitative and allows for a greater degree of the identification and description of effects rather than attempting to ascribe a quantitative value, which is more restrictive (and potentially misleading) at the regional level.

The IIA objectives described in this section have been informed by the baseline evidence, the consideration of the key sustainability issues for London, the review of plans and programmes and the comments received during the consultation of the IIA Scoping Report. Broadly, the objectives present the preferred environmental, social or economic outcome which typically involves minimising detrimental effects and enhancing positive effects. They have been formulated to allow for a comprehensive assessment of the key effects of the implementation of the London Plan by covering the relevant environmental, social and economic aspects (including equalities, health and community safety).

The *indicative guide questions* have been formulated to provide more detailed guidance for assessors to the aspects that should be considered with regards to the likely effects that may occur. They are not designed to be read as targets or aims with which to achieve the objective. The objectives and guide questions are listed in **Table 3.3**.

Table 3.3 IIA Objectives and Guide Questions

IIA Objectives	Guide Questions for the IIA	SEA Topic Requirement
1. Regeneration & Land-Use. To stimulate regeneration and urban renaissance that maximises benefits the most deprived areas and communities.	<ul style="list-style-type: none"> • Will the regeneration have benefits for deprived areas? • Will it help to make people feel positive about the area they live in? • Will it help to create a sense of place and 'vibrancy'? • Will it help reduce the number of vacant and derelict buildings? • Will it make the best use of scarce land resources and reuse brownfield sites? • Will it minimise impacts of development on the environment? 	Material Assets
2. Biodiversity. To protect, enhance and promote the natural biodiversity of London.	<ul style="list-style-type: none"> • Will it conserve and enhance habitats and species and provide for the long-term management of natural habitats and wildlife (in particular will it avoid harm to national or London priority species and designated sites)? • Will it improve the quality and extent of designated and non-designated sites? • Will it provide opportunities to enhance the environment and create new conservation assets (or restore existing wildlife habitats)? • Will it protect and enhance the region's waterbodies to achieve a good ecological status? • Will it promote, educate and raise awareness of the enjoyment and benefits of the natural environment? • Will it bring nature closer to people, especially in the most urbanised parts of the city? • Will it promote respect and responsibility for the wise management of biodiversity? • Will it improve access to areas of biodiversity interest? • To enhance the ecological function and carrying capacity of the green space network? 	Biodiversity, Fauna, Flora, Soil, Water, Landscape
3. Health and Well-being. To maximise the health and well-being of the population and reduce inequalities in health.	<ul style="list-style-type: none"> • Will it help reduce poverty and the impact of income inequality? • Will it help reduce health inequalities? • Will it help improve mental and emotional health? • Will it improve access to high quality public services (including health facilities)? 	Population, Human Health
4. Equalities. To ensure equitable outcomes for all communities, particularly those most at risk to experience discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London.	<ul style="list-style-type: none"> • Will it reduce poverty and social exclusion in those areas and communities most affected? • Will it promote a culture of equality, fairness and respect for people and the environment? • Will it promote equality for black and minority ethnic communities, women, disabled people, lesbians, gay men, bisexual and transgender people, older people, young people, children and faith groups? • Will it benefit the equality target groups listed above • Will it promote adequate accessibility for those people who are elderly or disabled? 	Population, Human Health

<p>5. Housing. To ensure that all Londoners have access to good quality, well-located, affordable housing.</p>	<ul style="list-style-type: none"> • Will it reduce homelessness and overcrowding? • Will it reduce the number of unfit homes? • Will it increase the range and affordability of housing (taking into account different requirements and preferences of size, location, type and tenure)? • Will it ensure that appropriate social and environmental infrastructure are in place for new residents? • Will it provide housing that ensures a good standard of living and promotes a healthy lifestyle? • Will it promote lifetime homes? • Will it improve overall design quality? • Will it increase use of sustainable design and construction principles? • Will it improve insulation and energy efficiency in housing to reduce fuel poverty and ill-health? • Will it provide housing that encourages a sense of community and enhances the amenity value of the community? • Will it ensure homes are well located in relation to flood risk? 	<p>Population, Human Health, Material Assets</p>
<p>6. Employment. To offer everyone the opportunity for rewarding, well-located and satisfying employment.</p>	<ul style="list-style-type: none"> • Will it help generate satisfying and rewarding new jobs? • Will it help to provide employment in the most deprived areas and stimulate regeneration? • Will it help reduce overall unemployment, particularly long-term unemployment? • Will it help to improve learning and the attainment of skills? • Will it encourage the development of healthy workplaces? 	<p>Population, Material Assets</p>
<p>7. Stable Economy. To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.</p>	<ul style="list-style-type: none"> • Will it improve sustainable business development? • Will it improve the resilience of business and the economy? • Will it help to diversify the economy? • Will it prevent the loss of local businesses? • Will it encourage business start-ups and support the growth of businesses? • Will it encourage ethical and responsible investment? • Will it help reduce levels of deprivation? • Will it support the development of green industries and a low carbon economy? • Will it help maintain London as an internationally competitive city? 	<p>Population, Material Assets,</p>
<p>8. Flood Risk and Climate Change Adaptation. To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.</p>	<ul style="list-style-type: none"> • Will it manage existing flood risks appropriately and avoid new flood risks? • Will it protect London from climate change impacts? • Will it minimise the risk of flooding from rivers and watercourses to people and property? • Will it help London function during periods of drought? • Will it help avoid overheating in the built environment? 	<p>Climatic Factors</p>

<p>9. Climate Change Mitigation and Energy. To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.</p>	<ul style="list-style-type: none"> • Will it help minimise emissions of greenhouse gases? • Will it help London meet its emission targets? • Will it avoid exacerbating the impacts of climate change? • Will it increase the proportion of energy both purchased and generated from renewable and sustainable resources. • Will it reduce the demand and need for energy? • Will it promote and improve energy efficiency? 	<p>Climatic Factors, Material Assets</p>
<p>10. Water Quality & Water Resources. To protect and enhance London's waterbodies and the Blue Ribbon Network.</p>	<ul style="list-style-type: none"> • Will it improve the quality of waterbodies? • Will it reduce discharges to surface and ground waters? • Will it promote sustainable urban drainage? • Will it improve the water systems infrastructure (e.g. water supply/sewerage)? • Will it reduce abstraction from surface and ground water sources? • Will it reduce water consumption? • Will it help to meet the objectives of the Water Framework Directive? 	<p>Water</p>
<p>11. Waste. To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.</p>	<ul style="list-style-type: none"> • Will it help minimise the production of waste? • Will it help minimise resource use? • Will it promote reuse and recycling (e.g. in the design of housing, etc)? • Will it help to promote a market for recycled products? 	<p>Population, Material Assets</p>
<p>12. Accessibility and Mobility. To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).</p>	<ul style="list-style-type: none"> • Will it encourage a modal shift to more sustainable forms of travel as well as encourage greater efficiency (e.g. through car-sharing)? • Will it reduce the overall need for people to travel by improving their access to the services, jobs, leisure and amenities in the place in which they live? • Will it reduce traffic volumes and traffic congestion? • Will it reduce the length of commuting journeys? • Will it help to provide a more integrated transport service from start to finish (i.e. place of residence to point of service use or place of employment)? • Will it support an increase in the number of sub-regional and orbital public transport routes that facilitate locally based living? • Will it improve accessibility to work by public transport, walking and cycling? • Will it reduce road traffic accidents? 	<p>Population</p>
<p>13. Built and Historic Environment. To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces are appropriately designed.</p>	<ul style="list-style-type: none"> • Will it protect and enhance sites, features and areas of historical, archaeological and cultural value/potential? • Will it conserve and enhance the townscape/cityscape character? • Will it promote high quality design and sustainable construction methods? • Will it respect visual amenity and the spatial diversity of communities? • Will it enhance the quality of the public realm? • Will it support and enhance cultural heritage? • Will it improve the wider built environment and sense of place? 	<p>Cultural Heritage (including architectural and archaeological heritage), Landscape</p>

14. Liveability and Place. To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.	<ul style="list-style-type: none"> • Will it create and sustain vibrant and diverse communities and encourage increased engagement in recreational, leisure and cultural activities? • Will it increase the provision of culture, leisure and recreational activities? • Will it support the provision of quality, affordable and healthy food? • Will it provide opportunities for people to choose an active, fulfilling life? • Will it increase the provision of key services, facilities and employment opportunities? • Will it positively enhance and promote the perceived sense of place held by the community? • Will it protect and enhance the provision of open space? • Will it help reduce actual levels of crime and antisocial behaviour? • Will it help reduce the perception of crime in an area? • Will it help reduce actual noise levels and disturbances from noise? • Will it help reduce the risk of terrorist attack? 	Population, Human Health, Material Assets, Landscape, Cultural Heritage (including architectural and archaeological heritage)
15. Open Space. To protect and enhance natural open space in London.	<ul style="list-style-type: none"> • Will it protect and enhance areas of open space? • Will it improve access to open space and improve the quality and quantity of publicly accessible greenspace? • Will it address areas with deficiencies of access to open space? • Will it increase Londoners access for recreation purposes? • Will it promote urban greening? • Will it promote and support the function of the Blue Ribbon Network? 	Biodiversity, Flora, Fauna, Landscape
16. Air Quality. To improve London's air quality.	<ul style="list-style-type: none"> • Will it improve air quality? • Will it reduce emissions of greenhouse gases? • Will it help to reduce emissions of PM10 and NO2? • Will it reduce emissions of ozone depleting substances? • Will it help to achieve national and international standards for air quality (for example, those set out in the Air Quality Regulations 2000 and (Amendment) Regulations 2002? 	Air

3.5 Completing the Assessment

The IIA of the draft replacement London Plan was undertaken by sustainability and technical consultants at Entec with specialist health input provided by Ben Cave Associates and specialist equalities input provided by Zahno Rao Associates. Support and input was also provided by the GLA where necessary.

The assessment examined the policies presented under each of the chapters in the London Plan (i.e. London's Places, London's People etc.) against each of the 16 IIA objectives. In predicting effects, changes are identified in the baseline which would occur as a result of the implementation of the London Plan. The cumulative effects of implementing the Plan were also considered (see **Appendix J**). However, due to the strategic and forward-looking nature of the document, quantitative information is not always available to inform the prediction of effects for all the policies within the Plan. Where this is the case, the effects have been identified based on professional judgement by experienced technical experts and with consideration to relevant best practice guidance. In consequence, this IIA report presents the assessment of the policies within the final draft of the replacement London Plan.

3.5.1 Policy development and Iterations

The development of the draft replacement London Plan has been an iterative process involving technical experts advising on the potential effects that may arise. Suggestions were proposed to improve the early drafts of the policies and to include mitigation measures through liaison with the London Plan team at the GLA. In this way these suggestions were intended to mitigate potential negative effects (or enhance positive effects). **Appendix E** records the suggestions made and the responses following their consideration by the London Plan policy authors during the drafting of the replacement plan. The changes made include:

- **A review of the vision and strategic policies:** For example, an explicit reference to climate change was added to the vision; reference to quality of life added to Policy 1.1 and a supporting paragraph added on quality of life and the environment in inner London.
- **Policy amendments:** For example, adding reference to climate change adaptation (in Policy 2.6), adding reference to ‘future residents’ when referring to quality of life (in Policy 2.6); adding reference to the needs of older people (Policy 3.5); adding reference to water efficiency measures (Policy 5.15) and adding reference to disadvantaged or socially excluded groups (in Policy 3.1).
- **Clarifying policies and supporting text:** For example, in relation to social infrastructure; the requirement to undertake HIA (Policy 3.2); the needs of London’s diverse population; the definition of tall buildings (Policy 7.7) and connecting poorer areas with opportunity areas in London.
- **Re-ordering policies:** Policy 3.1 (Ensuring equal life chances) was put to the beginning of the Chapter to give it more emphasis. The appraisal team also supported the renaming of Chapter (from Quality of Life) to London’s Living Places and Spaces.

3.5.2 Compatibility between Mayor’s Objectives and the IIA

A compatibility matrix is provided in **Table 3.4** to highlight the compatibility of the Mayor’s six objectives with those of the IIA. It shows that there are no identified incompatible objectives. The matrix shows the key relationships between objectives, therefore, blank boxes indicate where there is broadly no direct or significant relationship between the objectives.

Table 3.4 Compatibility between Mayor's Objectives and the IIA

Mayor's Objectives Sustainability Objectives	1. A city that meets the challenges of economic and population growth	2. An internationally competitive and successful city	3. A city of diverse, strong, secure and accessible neighbourhoods	4. A city that delights the senses	5. A city that becomes a world leader in improving the environment	6. A city where it is easy safe and convenient for everyone to access jobs, opportunities and facilities
1. Regeneration and Land-Use	✓	✓	✓	✓	✓	
2. Biodiversity				✓	✓	
3. Health and Well-being	✓			✓	✓	✓
4. Equalities	✓	✓	✓			✓
5. Housing	✓		✓	✓		
6. Employment	✓	✓				✓
7. Stable Economy	✓	✓				✓
8. Flood Risk and Climate Change Adaptation					✓	
9. Climate Change Mitigation and Energy					✓	
10. Water Quality & Water Resources	✓				✓	
11. Waste	✓				✓	
12. Accessibility and Mobility			✓			✓
13. Built and Historic Environment		✓	✓	✓		
14. Liveability and Place		✓	✓	✓	✓	✓
15. Open Space				✓	✓	
16. Air Quality					✓	✓
Compatibility Key: <div> <div>✓ - Compatible. The Mayor's objective is compatible with the IIA objective and may help achieve it.</div> <div>✗ – Incompatible. The Mayor's objective is incompatible with the IIA objective and may have a detrimental effect on it.</div> <div>A blank box indicates that the Mayor's objective no direct relationship to the IIA objective.</div> </div>						

3.6 Assumptions and Technical Difficulties

As identified in **Section 3.4**, it is assumed that all relevant legal requirements will be met as necessary and as such specific reference to the compliance of the replacement London Plan's implementation with statutory limits and targets has not been made in the assessment or the IIA objectives.

Where the terms 'minimise' or 'maximise' are used, this refers to minimisation or maximisation subject to the consideration of the potential costs and benefits, as opposed to 'absolute minimisation or maximisation' (i.e. regardless of costs). If any definition of these terms, other than that assumed, it will be clearly stated.

No technical difficulties were encountered in compiling the required information for this report.

3.7 Habitats Regulations Assessment

A Habitats Regulations Assessment (HRA) screening report has been produced as required by the European Habitats Directive, enacted by the *Conservation (Natural Habitats and c) Regulations 1994* (the Habitats Regulations)² and is published separately. This assessment of the draft replacement plan has identified many policies for which it can be concluded there would be no likely significant effects. In addition, policies which could give rise to 'likely significant effect' on European sites have been identified, where it cannot be concluded at this stage that they will have no likely significant effects.

Where it has been considered that the Habitats Regulations Assessment of some policies is more appropriate at a lower tier this has been identified taking account of the criteria set out in draft guidance from Natural England. Any lower tier development will ensure that there is sufficient flexibility at that stage to allow changes to be made to ensure that the policies set out in this higher level plan are not compromised, taking account of any in-combination effects at that stage. The recommendations have commented on the likely scope for these lower tier assessments where appropriate. The HRA screening report is available at www.london.gov.uk.

² ERM Limited. *Habitats Regulations Assessment, Screening Report- Consultation draft replacement London Plan*. GLA 2009.

4. Assessment of Chapter 1 (Context and Strategy)

4.1 Summary of Policies in Chapter 1 (Context and Strategy)

4.1.1 Baseline

The IIA will assess the potential impacts of the policies of the draft replacement London Plan against sixteen objectives (as identified in **Section 3.4** of the IIA Report) and presented in grey boxes in the assessment.

In terms of baseline, relevant information of current trends and state of the environment is set out at the beginning of each thematic chapter. As this chapter sets the overall context, all the baseline presented in the following chapters is considered relevant, and has consequently not been duplicated in this section. It is considered useful to acknowledge the driving forces behind the current baseline trends and targets as set out in the existing London Plan to frame progress of the London Plan to date. The Plan's vision is to develop London as an exemplary, sustainable world city based on three interwoven themes:

- Strong, diverse long term economic growth;
- Social inclusivity to give all Londoners the opportunity to share in London's future success; and
- Fundamental improvements in London's environment and use of resources.

4.1.2 Policy

Chapter 1 sets the overall context of the London Plan, explaining the major issues facing London over the period up to 2031 and providing the background to the detailed policies in succeeding chapters. It sets out the Mayor's vision and objectives for the development of London over the period of the Plan and that the policies within the London Plan should seek to achieve. The Mayor's vision is that:

Over the years to 2031 and beyond, London should excel among global cities – expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st Century, particularly that of climate change.

The vision is supported by six objectives. The Mayor's vision and objectives are set out in more detail in **Section 2.3**.

The following policy is presented within Chapter 1 of the London Plan.

Policies in Chapter 1 (Context and Strategy)

Policy 1.1: Delivering the Strategic Vision and Objectives for London

4.2 Summary of the effects of Chapter 1 (Context and Strategy)

Chapter 1 sets out the policy requirement for the draft replacement London Plan, other planning documents produced by the Mayor (or boroughs), and development decisions that aim to realise the Mayor's overall vision. These objectives are largely anticipated to have a positive effect towards achieving the IIA objectives. In particular, it is likely to have a significantly positive effect towards stimulating regeneration and supporting urban renaissance across London. As it is the intention that the policies in the remaining chapters of the Plan support the implementation of Policy 1.1 (including the vision and objectives set out by the Mayor) it is anticipated that these will also be positive. Indeed, following the assessment of the remaining Chapters of the Plan no significant detrimental effects were identified. Therefore, cumulatively the draft replacement London Plan as a whole is unlikely to have any significant detrimental effects. The cumulative effects of the Plan in combination with the Economic Development Strategy and the Mayor's Transport Strategy have also been considered and a summary is outlined in **Appendix J**.

4.3 Assessment of Chapter 1 (Context and Strategy)

1. Regeneration & Land-Use: To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities.

Accommodating growth and development within London's boundary is likely to affect land-use and regeneration. For example an increased demand for housing and social infrastructure by a growing population will require the efficient use of available land to ensure that demand is adequately met without the loss of open space.

KEY EFFECTS:

The chapter is anticipated to significantly contribute towards supporting regeneration and urban renaissance.

The policy in Chapter 1 seeks to ensure that the London Plan vision and objectives are realised. This is likely to contribute significantly towards the regeneration and land-use objective by ensuring London is an internationally competitive and successful city; a city of diverse, strong, secure and accessible neighbourhoods; and a city that becomes a world leader in improving the environment. The realisation of the Mayor's vision and objectives is likely to lead towards regeneration within London, which is anticipated to help deliver improved neighbourhoods and strengthened communities through enhancements to the public realm and physical environment. It is also anticipated to increase the availability and accessibility of opportunities to the population, particularly those within deprived areas. The implementation of the vision, as set out by the policy, is also likely to deliver a more sustainable use of land as it specifically states that the challenges of population and economic growth should be met

in ways that ensure a sustainable quality of life and that also makes effective use of resources, of which land, among other things, is a key resource.

2. Biodiversity: To protect, enhance and promote the natural biodiversity of London.

It is recognised that the projected growth in the population and associated economic development could potentially increase pressure on biodiversity. For example, there may be an increased disturbance of wildlife or habitats as a result of higher levels and concentrations of activity. Baseline evidence highlights that in 2008 there was a significant loss of open space and designated Sites of Nature Conservation (Mayor of London (2009) *Annual Monitoring Report 5*, GLA, London), although this was due to one particularly large development (which was also required as part of its planning permission to provide compensation and replacement of lost open space). Previous Annual Monitoring Reports have identified a minor negative trend due to very slight losses of designated sites recorded each year, although such losses are generally negligible (approximately 1 ha per year). However, cumulatively, a continued and sustained loss of designated site coverage each year over the London Plan period may affect the objective, although at such rates it may be considered minor.

KEY EFFECTS:

The chapter is likely to contribute positively towards the objective on biodiversity as a result of implementing the Mayor's objectives, particularly ensuring London is a city that becomes a world leader in improving the environment. It is noted that policies elsewhere in the London Plan specifically address biodiversity issues, notably in Chapter 7.

However, Policy 1.1 sets out that growth and change in London will be managed in order to realise the Mayor's vision and objectives, in particular ensuring London is a city that meets the challenges of economic and population growth and is a city that becomes a world leader in improving the environment. Specific policies to implement these objectives and address biodiversity are set out elsewhere in the London Plan, notably in Chapter 7. It is expected that the implementation of the London Plan, and the achievement of the Mayor's vision and objectives are likely to contribute positively to protecting, enhancing and promoting biodiversity by ensuring growth is appropriately managed.

3. Health and Well-being: To maximise the health and well-being of the population and reduce inequalities in health.

The implementation of Policy 1.1 is likely to contribute positively towards health and well-being. This is due to the emphasis given to achieving the highest quality of life. This is likely to result in enhancements in health by promoting healthy environments in which people live and work, as well as providing access to open spaces and high quality physical environments. This may encourage the uptake of physical activity and is likely to improve the well-being of vulnerable people.

KEY EFFECTS:

The chapter seeks the implementation of the Mayor's vision and objectives that promote the achievement of the highest quality of life. This is likely to contribute positively towards health and well-being which is intricately linked with quality of life.

The Health Impact Assessment (presented in **Appendix B**) highlights how the policies within the thematic chapters generally contribute positively towards health and well-being. As the policies within the London Plan seek to implement the vision and its objectives, Policy 1.1 is likely to positively contribute towards health and well-being.

4. Equalities: To ensure equitable outcomes for all communities, particularly those most at risk to experience discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London.

The chapter is likely to contribute positively towards the objective as a result of realising the Mayor's objectives of a city that meets the challenges of economic and population growth, a city of diverse, strong, secure and accessible neighbourhoods, and a city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities. As highlighted by the Equalities Impact Assessment (presented in **Appendix C**), Policy 1.1 promotes the implementation of the Mayor's vision and objectives, which are likely to positively contribute towards equality.

KEY EFFECTS:

There may be a positive contribution from the realisation of the Mayor's objectives, particularly 'a city of diverse, strong, secure and accessible neighbourhoods' and 'a city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.'

5. Housing: To ensure that all Londoners have access to good quality, well-located, affordable housing.

The chapter is likely to contribute positively to the accessibility and availability of good quality affordable housing by encouraging the realisation of the Mayor's objectives, particularly a city that meets the challenges of economic and population growth, a city of diverse, strong, secure and accessible neighbourhoods, a city that delights the senses and a city that becomes a world leader in improving the environment.

KEY EFFECTS:

The chapter is anticipated to positively contribute towards ensuring all Londoners have access to good quality, well-located and affordable housing.

6. Employment: To offer everyone the opportunity for rewarding, well-located and satisfying employment.

The chapter is anticipated to contribute positively towards the objective by encouraging the realisation of the Mayor's vision and objectives which state that London should 'excel among global cities' as a city that meets the challenges of economic and population growth, is an internationally competitive and successful city and a city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities.

KEY EFFECTS:

The chapter is likely to have a significant positive contribution towards providing everyone with the opportunity for employment.

7. Stable Economy: To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.

The chapter is anticipated to contribute positively towards a stable economy by encouraging the realisation of the Mayor's vision and objectives. These state that London should 'excel among global cities' as an internationally competitive and successful city which has a strong and diverse economy and entrepreneurial spirit that benefits all Londoners.

KEY EFFECTS:

The chapter is anticipated to contribute positively towards the objective by realising the Mayor's vision and objective of London being an internationally competitive and successful city with a strong and diverse economy.

8. Flood Risk and Climate Change Adaptation: To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.

The chapter is likely to have a positive effect as it seeks to implement the Mayor's vision of achieving the highest environmental standards and quality of life. The realisation of the Mayor's objectives of a city that becomes a world leader in improving the environment, taking the lead in tackling climate change is also likely to have a positive effect.

KEY EFFECTS:

The chapter is likely to have a positive effect through realising the Mayor's objective of becoming a world leader in improving the environment and taking the lead in tackling climate change.

9. Climate Change Mitigation and Energy: To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.

The chapter is likely to contribute positively to global climate change mitigation as it seeks to realise the Mayor's vision and objectives, particularly becoming a world leader in improving the environment, taking the lead in tackling climate change and developing a low carbon economy.

KEY EFFECTS:

There is likely to be a positive effect on climate change mitigation as a result of the realisation of the Mayor's vision and objectives.

10. Water Quality & Water Resources: To protect and enhance London's waterbodies and the Blue Ribbon Network.

The chapter seeks to realise the Mayor's vision and objectives to achieve the highest environmental standards and be a city that becomes a world leader in improving the environment. Consequently, it is likely to contribute positively towards improving water quality and resources.

KEY EFFECTS:

The chapter is likely to contribute positively to improving water quality through the implementation of the Mayor's vision and objective to achieve the highest environmental standards and become a world leader in improving the environment.

11. Waste: To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.

The chapter is likely to contribute positively towards the minimisation of the production of waste and increase re-use, recycling, remanufacture and recovery rates through the realisation of the Mayor's objective for London to become a world leader in improving the environment, in particular by consuming fewer resources and using them more effectively.

KEY EFFECTS:

The chapter is likely to contribute positively towards the minimisation of waste through the realisation of the Mayor's objective.

12. Accessibility and Mobility: To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).

The chapter is anticipated to have a positive effect towards maximising the accessibility for all in London as it supports and seeks to realise the Mayor's vision and his commitment to ensuring all Londoners enjoy a good and improving quality of life sustainable over the life of this Plan and into the future. In particular, the Mayor's objective of a city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system which actively encourages more walking and cycling is likely to contribute positively towards improving accessibility and mobility.

KEY EFFECTS:

The chapter is anticipated to have a positive effect on accessibility and mobility through the realisation of the Mayor's objective of having a city with an efficient and effective transport system that actively encourages more walking and cycling.

13. Built and Historic Environment: To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces and appropriately designed.

Chapter 1 seeks to ensure the London Plan and other spatial planning documents within London help to realise the Mayor's vision that promotes heritage and his objectives, particularly creating a city that delights the senses and takes care over its buildings and streets, and that makes the most of London's built heritage. It is therefore considered that there is likely to be a positive effect towards the built and historic environment.

KEY EFFECTS:

The chapter is anticipated to contribute positively towards the built and historic environment through the realisation of the Mayor's vision and objectives.

14. Liveability and Place: To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.

Chapter 1 is likely to contribute positively towards liveability and sense of place by encouraging the realisation of the Mayor's vision and objectives. In particular, his vision for achieving the highest environmental standards and quality of life by ensuring London makes the most of the dynamism and diversity that characterises the city, and his objective of a city of diverse, strong, secure and accessible neighbourhoods is likely to lead towards sustainable, mixed use environments that promote long-term social cohesion and a sense of place.

KEY EFFECTS:

Chapter 1 is anticipated to contribute positively towards liveability and sense of place by promoting the Mayor's objective for strong secure neighbourhoods that promote a sense of place.

15. Open Space: To protect and enhance natural open space in London.

Chapter 1 seeks to ensure that the London Plan and subsequent spatial planning documents help realise the Mayor's vision and objectives. The Mayor makes reference to making the most of and extending London's wealth of open and green spaces and waterways within the objective of

KEY EFFECTS:

Chapter 1 is likely to have a positive effect on the open space through the realisation of the Mayor's vision and objectives.

creating a city that delights the senses. It is therefore anticipated that there will be a positive effect towards the open space IIA objective of protecting and enhancing natural open space.

16. Air Quality: To improve London's air quality.

It is likely that Chapter 1 will contribute positively to improving air quality by realising the Mayor's vision and objective to achieve the highest environmental standards by ensuring that London is a city that becomes a world leader in improving the environment, including reducing pollution.

KEY EFFECTS:

The chapter is likely to have a positive contribution towards improving air quality in London by implementing the Mayor's vision and objectives.

5. Assessment of Chapter 2 (London's Places)

5.1 Summary of Policies in Chapter 2 (London's Places)

5.1.1 Baseline summary

The settlement pattern of the London region has experienced significant change in its the capital's history, but the current urban form was primarily influenced by the introduction of faster and more accessible transport from the 19th century. This combined with a changing economy and living standards, transformed the character and population density of most parts of the region.

The increased availability of land for housing allowed the population to expand rapidly until the Second World War. This population growth considerably altered towns such as Croydon, Kingston, Harrow and Romford and their hinterland and created the Greater London region as recognised today. By 1939, London's population reached its peak, at 8.6 million. This period saw the beginning of policies to constrain London's physical growth (such as the green belt), encourage development in other parts of the country and reduce the density at which Londoners lived. Decentralisation accelerated in the post-war years with measures like the building of the English new towns. The result was that London's population started to fall, reaching a low of 6.7 million by 1988.

However, London's population has increased every year since 1988. Even during the economic downturn of the early 1990s, London's population grew and overall growth accelerated. The reason for the change in trend was that more people of childbearing age moved to the city, leading to strong natural population growth (the surplus of births over deaths). By mid-2007 (the most recent year for which the GLA has population data) it was estimated that London's population was 7.56 million, up 44,000 on the previous year. Of this total population, 3 million live in central and inner London and 4.56 million in outer London boroughs.

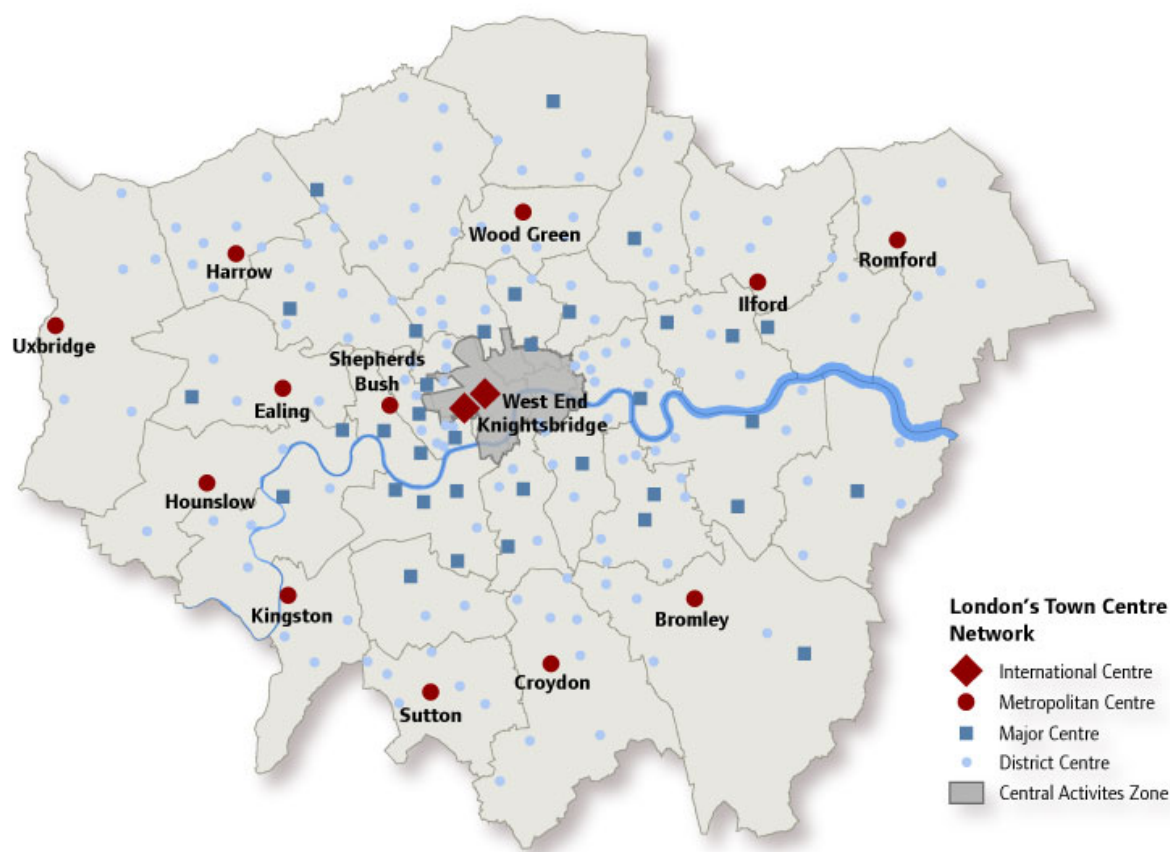
The growth dynamics of inner London (including the Central Activities Zone (CAZ)) and outer London (see Figure 3.3) are key considerations for the London Plan review. For example, inner London is characterised by a strong focus on commercial, cultural and employment activities, whilst outer London has more residential focused activities. As a result, economic development within the region has developed a distinct geography.

London's future growth and development is largely related to the population and employment characteristics. However, it is important to consider the current geography of activities within London and how these relate to London's 'places'. Key considerations include the existing network of town centres (see **Figure 5.1**), locations where extensive regeneration and intensification is planned (see **Figure 5.2**), and also strategic industrial locations (see **Figure 5.3**).

London's network of town centres is classified in terms of the size of each and the type of activity that exists there. The two international centres are located in the CAZ, whilst the next tier down, metropolitan centres, are

distributed in outer London locations. A third tier of major centres show a distinct clustering within inner London, and also appear in various locations in outer London.

Figure 5.1 London's Town Centre Network



Many of the locations in **Figure 5.2** are clustered centrally and stretch eastwards toward the significant (re)development opportunities in the Thames Gateway. This is contrasted by the more dispersed nature of strategic industrial locations which are more predominant in outer London, especially the East and North East of London.

Figure 5.2 Opportunity and Intensification Areas

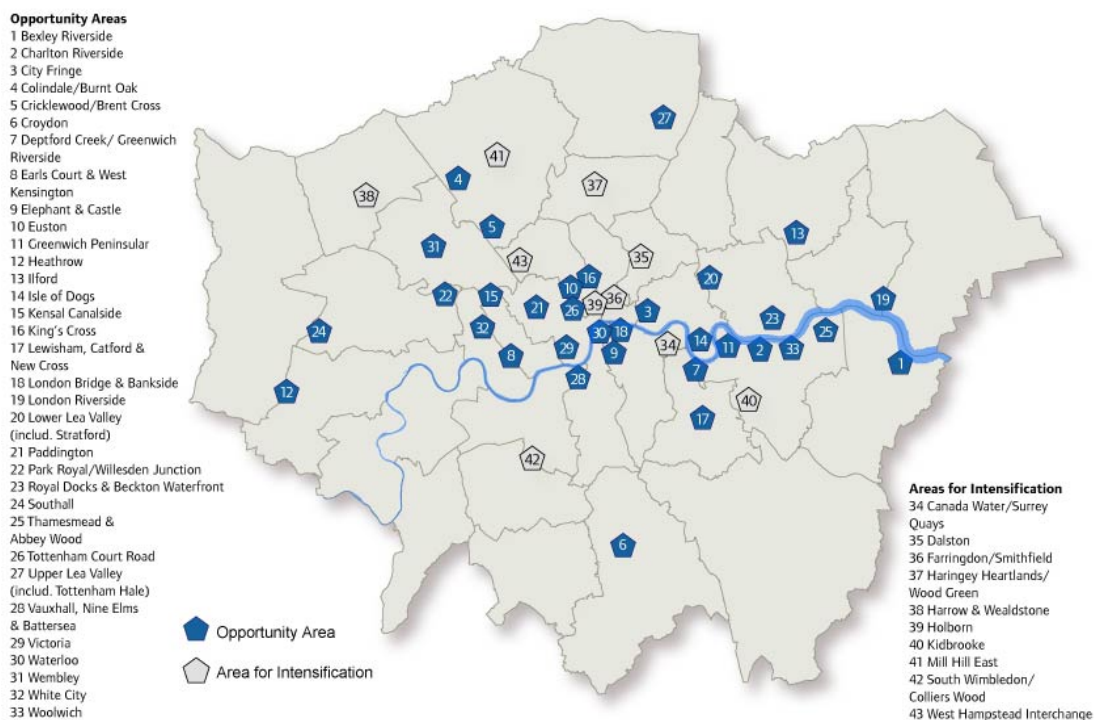


Figure 5.3 Strategic Industrial Locations

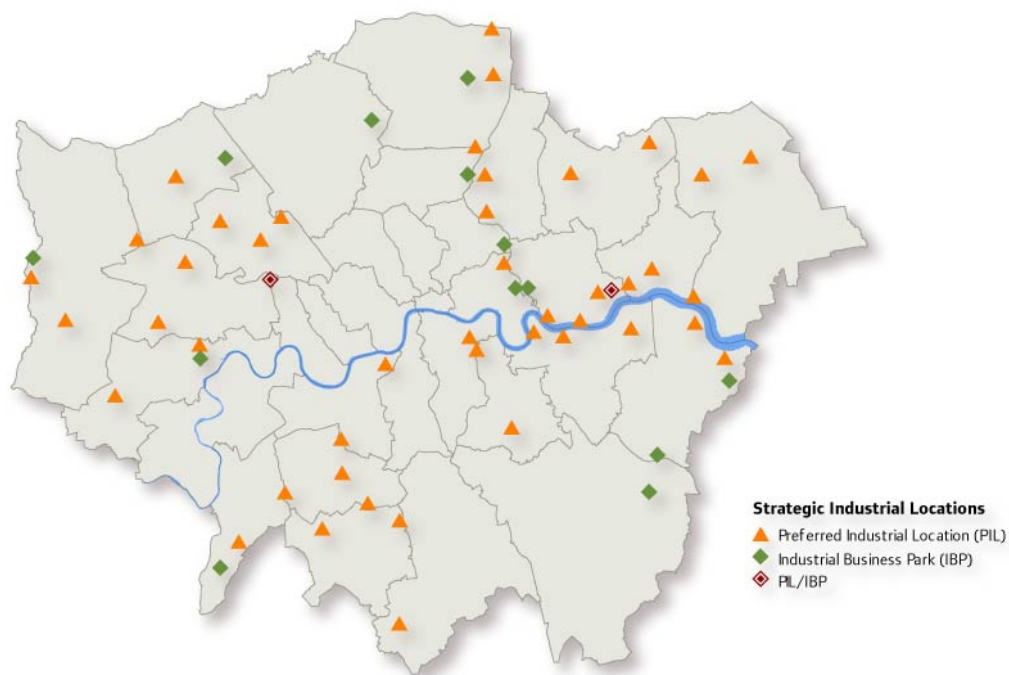
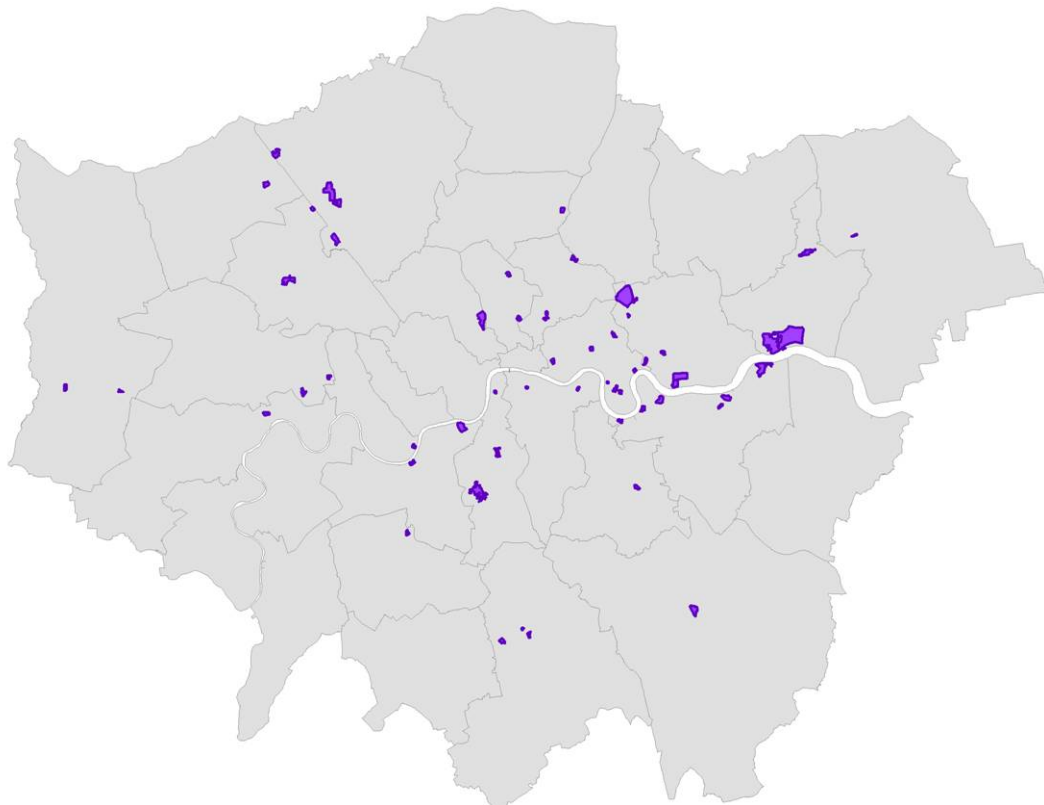


Figure 5.4 shows the locations of large scale development proposals (developments of over 500 residential units that have gained planning approval) since 2004.

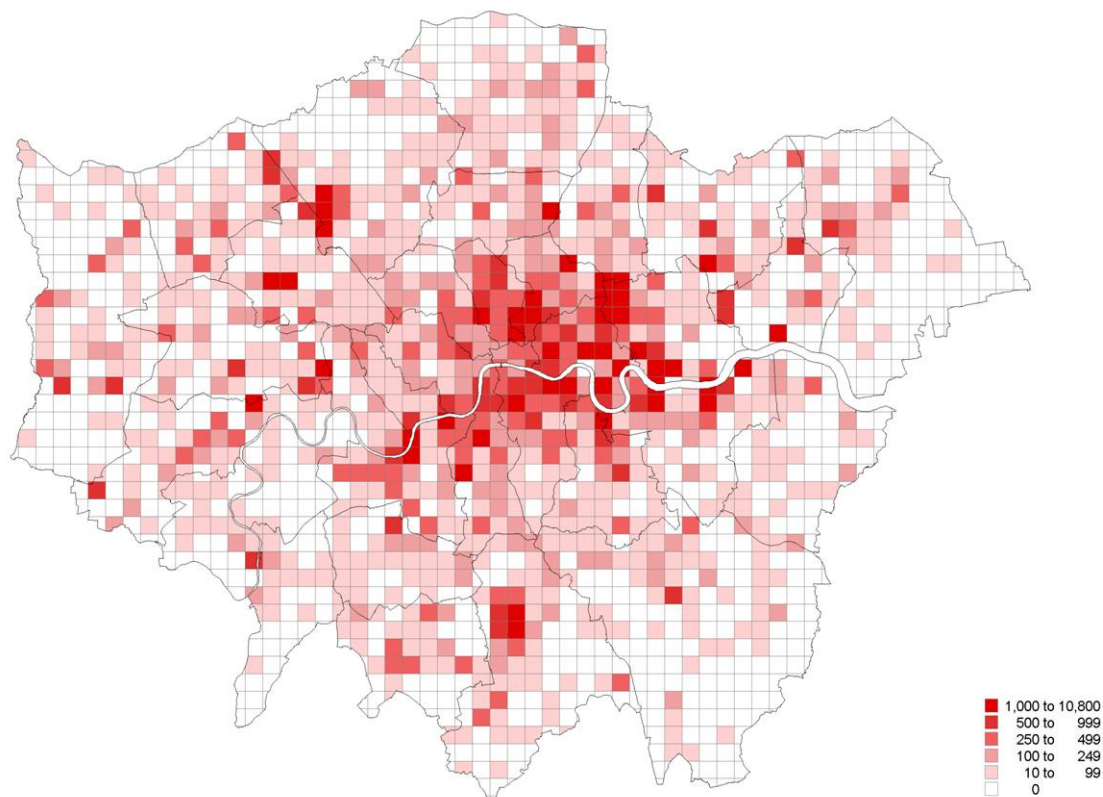
Figure 5.4 Major developments 2004 to 2008 (over 500 units)



To further illustrate the spatial variations in development across London, **Figure 5.5** shows the key concentrations of residential development between 2004 and 2008. A development is defined as an individual development proposal with planning permission that consists of at least 10 residential units (gross).

The shading in the map highlights where concentrations of proposed residential development are located, some of which will now be completed. This is represented on a grid basis to help smooth out the effect of large dominant schemes and provide a better representation of recent growth concentrations in London. **Figure 5.4** (above) shows a particular tendency for development to occur in central locations close to the River Thames.

Figure 5.5 Residential development since 2004



These spatial representations of where recent development has occurred in London highlight the outcomes of past planning policies that have sought to increase densities in central areas that are well served by public transport, and to renew and regenerate brownfield locations. The latter is particularly the case in areas of east London where there is significant development potential on sites that were formally used for manufacturing, warehousing or logistics uses.

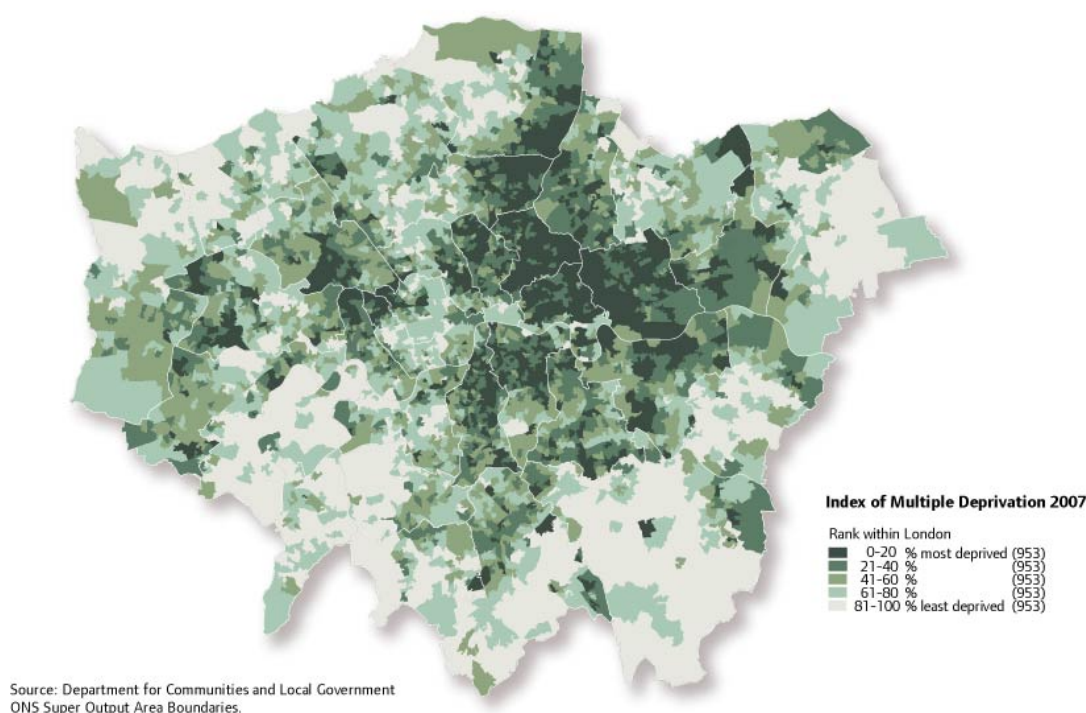
It is expected that the spatial development of London would continue to evolve in this fashion unless specific policies began to limit growth or divert significant growth into other areas. Many of the proposals for the Thames Gateway and other large brownfield opportunities within London are well advanced in the planning process and should continue to be the key focus of London's physical development. It is too early to accurately assess the impact of the current recession on the development of London, however, it is expected that any impact would only amount to a delay to current development or regeneration ambitions.

Figure 5.6 shows the Government's Index of Multiple Deprivation, which covers aspects like employment, housing, health, education and access to services. This highlights the particular concentration of disadvantaged people within the region (particularly in central, north and eastern parts of London, and also pockets in west London). The most significant concentrations are located in eastern areas of the region, which also correlates with

a number of significant regeneration opportunities identified above. The areas that comprise the 20 percent most deprived wards in London are also the focus of specific policy for ‘regeneration areas’ in the current London Plan.

The pattern of deprivation is fairly consistent across the various components of the Index, although some show a rather more dispersed pattern (for example, the component for housing). This pattern of deprivation highlights significant polarisation within London, which is expected to worsen over time unless policy inventions address the issues that underlie this.

Figure 5.6 Indices of Multiple Deprivation (2007)



London also possesses a wide range of parks and open space, which provide some of the capital’s key public assets. Around two-thirds of London’s 1,600 square kilometres is occupied by green spaces or water. Approximately a third of this is private gardens, another third is parks or sports facilities and the remaining third is wildlife habitat.

In addition to the Green Belt, which forms 22 per cent of London’s land area, 10 per cent of London is designated Metropolitan Open Land (MOL) within the built environment (this includes spaces such as Richmond Park and Hampstead Heath). **Figure 5.7** outlines the location and extent of these open spaces in London.

The network of rivers, canals, lakes and docks in London is what the London Plan calls the Blue Ribbon Network (see **Figure 5.8**). The network brings together a huge range of different places, used for many different purposes, but which share the unique attribute of water. These water spaces are relatively scarce in the region and past policies have sought to protect and enhance them.

Figure 5.7 London's Open Space Network

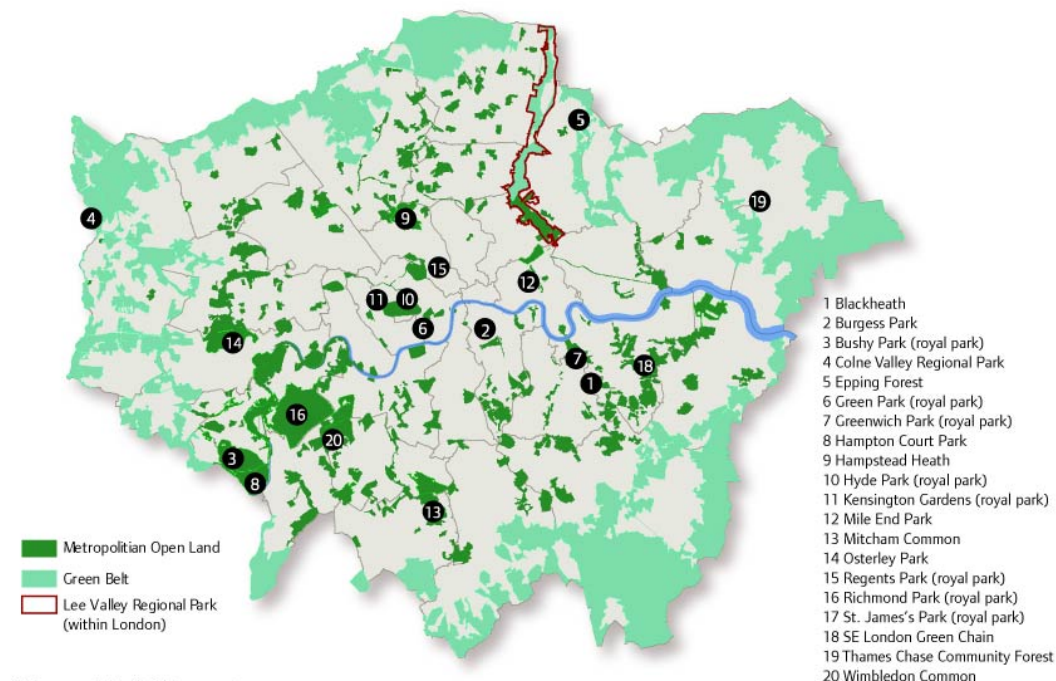
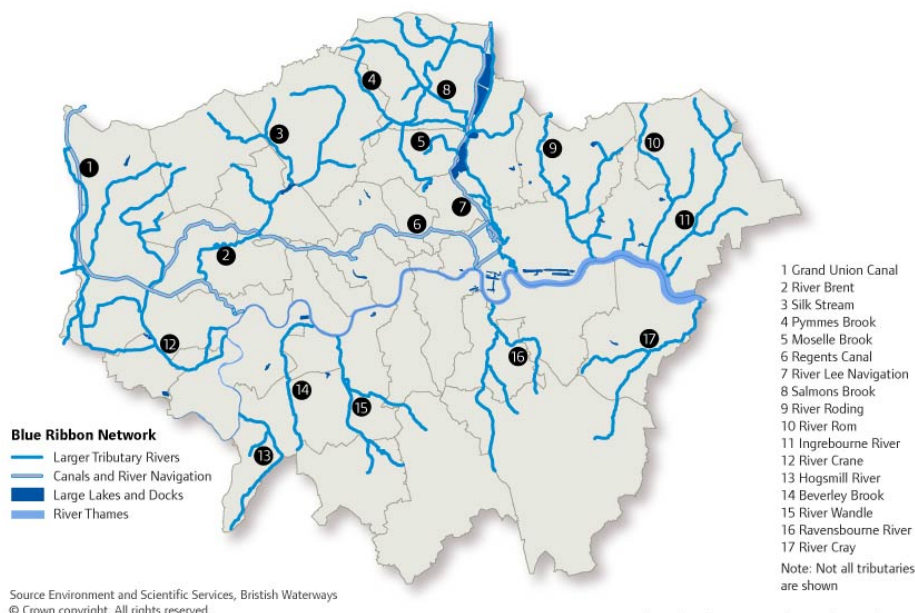


Figure 5.8 London's Blue Ribbon Network



These ‘green’ and ‘blue’ areas are vitally important to the sustainable development of London and contribute significantly to the quality of life the region offers. It is expected that these places will come under significant pressure as London continues to grow.

5.1.2 Policies

Chapter 2 contains policies primarily intended to deliver all of the objectives of the draft replacement London Plan, especially the third and fourth objectives which states that London should be:

A city that meets the challenges of economic and population growth in ways that ensure a sustainable good and improving quality of life for all Londoners and help tackle the huge issue of inequality among Londoners, including inequalities in health outcomes.

A city that becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy and consuming fewer resources and using them more effectively.

The policies for Chapter 2 have been developed against the objectives above and in the context of the following spatial strategy:

To welcome and encourage growth, development and infrastructure and to seek to enable it to take place within the current boundaries of Greater London, but without encroaching on the Green Belt, or on London’s open spaces or having unacceptable impacts on the environment, or quality of life in London.

The following policies relating to London’s places are presented within Chapter 2 of the draft London Plan.

Policies in Chapter 2 (London’s Places)	
Policy 2.1: London in its global, European and United Kingdom context	Policy 2.10: Central Activities Zone – strategic priorities
Policy 2.2 London and the wider metropolitan area	Policy 2.11: Central Activities Zone – strategic functions
Policy 2.3 Growth areas and co-ordination corridors	Policy 2.12: Central Activities Zone – predominantly local activities
Policy 2.4 The 2012 Games and their legacy	Policy 2.13: Opportunity Areas and Intensification Areas
Policy 2.5: Sub-regions	Policy 2.14: Areas for regeneration
Policy 2.6: Outer London: vision and strategy	Policy 2.15: Town Centres
Policy 2.7: Outer London: economy	Policy 2.16: Strategic outer London development centres
Policy 2.8: Outer London: transport	Policy 2.17 Strategic Industrial Locations
Policy 2.9: Inner London	Policy 2.18 Green infrastructure: the network of open and natural spaces

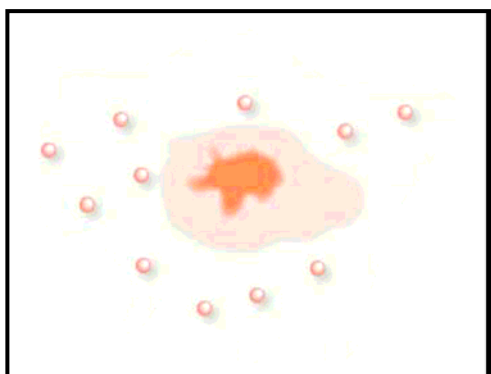
These policies seek to set out a framework for London’s places against the projected population and economic

increases. The policies in Chapter 2 also set to promote London in local, regional, national and international terms through the interactions with neighbouring councils, regions and countries. It also sets out the policy approach to developments in outer and inner London, as well as the Central Activities Zone (CAZ).

5.1.3 Strategic Spatial Options

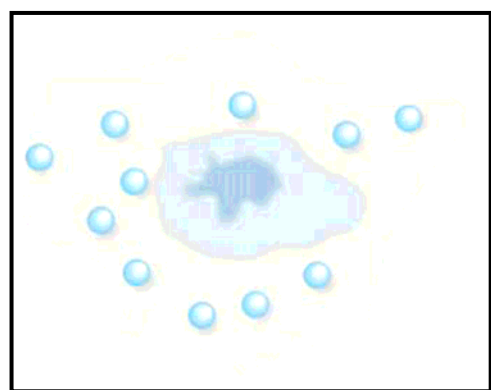
Three strategic spatial development options were developed and considered in the London Plan Review process to help guide policy development. They were developed in response to concerns regarding the existing London Plan's focus on outer London and the work of the Mayor's Outer London Commission. The strategic options were (each diagram is figurative only):

Strategic Spatial Development Option 1: No change, business as usual scenario



This option represents continuation of the existing London Plan strategy (devised in 2004) of addressing issues and encouraging growth concentrated in central and inner London. In particular, considerable employment growth is expected to occur within the Central Activity Zone (CAZ) and inner London, and there is a degree of emphasis on growth in east London (particularly within the Thames Gateway area). Growth is planned for specific centres in outer London and specific Opportunity Areas and Areas of Intensification. This option represents the 'business as usual scenario'.

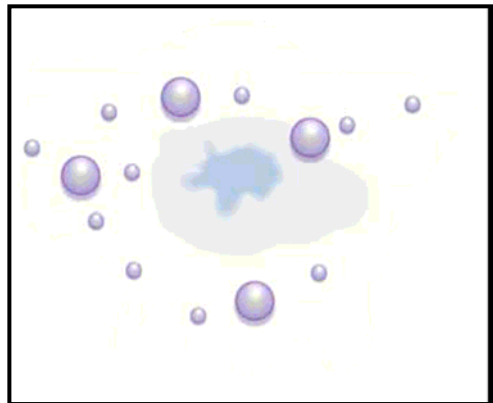
Strategic Spatial Development Option 2: Current London Plan direction plus enhanced growth in metropolitan town centres



This option recognises that there will still be a need for substantial growth in the Central Activity Zone and inner London. Employment growth would continue to be largely focused in inner and central London, although metropolitan town centres in outer London will become a key spatial priority. The option promotes the enhanced growth of a number of important metropolitan town centres to act as a focus for economic growth outside of central London, which would also include an intensification of residential development. It is expected that in this option, town centres will provide an important role in accommodating long-term growth pressures and satisfying Londoners'

needs for more localised services and facilities.

Strategic Spatial Development Option 3: Current London Plan direction plus enhanced growth in new Strategic Outer London Development Centres



This option also recognises that there will continue to be a substantial level of growth within central and inner London, particularly in terms of employment growth. It also recognises that town centres will be important growth points in outer London, as recognised in the exiting London Plan. However, it promotes substantial growth in outer London around four key strategic development centres. These locations would become strategic development centres, which will act as a focus for employment growth, including a focus on industries not currently prevalent in outer London. It is intended that such areas would bring in new development and investment rather than divert that already occurring in central London and in doing so, broaden the range of

opportunities in outer London. They would also result in an intensification of residential development around such areas.

Assessment

An assessment of the strategic spatial options was undertaken and is presented below:

Option	Strategic Spatial Option 1	Strategic Spatial Option 2	Strategic Spatial Option 3
1. Regeneration and Land-Use	Development in inner London is likely to contribute positively towards regenerating the most deprived areas in London by providing economic investment. This is likely to improve the quality of the physical environment and the public realm, as well as creating employment opportunities and improving the access for deprived communities with opportunities across London.	In addition to the effects of Option 1, there is likely to be a positive effect on regeneration by providing investment to improve the physical environment, including the public realm. It is also anticipated to generate employment opportunities within deprived areas, particularly those in outer London, whilst supporting the integration communities with opportunities available across London. More attention to the regeneration and development of metropolitan centres might generate employment and other opportunities in outer London.	In addition to the effects of Option 1, there is likely to be a positive effect, particularly in outer London through the attraction of specialised commercial activities and industries that may help to complement existing activities in strategic development centres. However, investment may become concentrated in the specific development centres, which could result in less investment in other areas or a potential drawing out of investment from other areas.
2. Biodiversity	Growth may increase the pressure on land and could affect habitats and biodiversity. The existing London Plan contains policies aimed at protecting biodiversity and open spaces that are likely to minimise any potential effects and these should be retained.		
3. Health and Well-being	The current London Plan focuses on regeneration within the northeast and southeast of London. As such, it is likely to contribute positively to improving the general health and well-being of London's population and reducing health inequalities by improving access to health services, increase opportunities for employment and participation in physical activity.	In addition to the effects identified in Option 1, the promotion of growth within outer London may support provision of additional health services where there are also areas of acute disadvantage. The London Plan must ensure that this spatial option does not increase existing inequalities in health by widening the gap between lower levels of health in inner London, and general higher levels of health in outer London area. No significant differences between Option 2 and Option 3 have been identified against this objective.	
4. Equalities	This option is likely to enhance the range of opportunities available to some of the most deprived and vulnerable communities in London as a result of inward investment and regeneration stimulated by the existing policies. By providing improved access to social infrastructure and employment opportunities, there is likely to be a significant positive effect on reducing inequalities.	In addition to the effects identified in Option 1, Option 2 would be likely to result in enhanced growth in metropolitan town centres. This may address the potential job inequality gap between inner and outer London that is not fully addressed by the existing 'business as usual' development. Increased investment is likely to expand employment opportunities and enable people to live closer to places of employment, thereby reducing the cost associated with travel to or from work. Consequently, there is likely to be a	This Option is likely to result in similar effects to those described in Option 2. However, this option may not be as positive as Option 2 since it concentrates investment and growth into fewer development centres, rather than the more dispersed town centres.

Option	Strategic Spatial Option 1	Strategic Spatial Option 2	Strategic Spatial Option 3
		positive effect on reducing inequalities.	
5. Housing	The spatial development options focuses on economic growth rather than the provision of houses. It is recognised that there may be mixed use developments that would include housing provision, but these are dependent on individual development schemes. Consequently, the effect on housing has not been considered as the spatial option is not anticipated to have an effect in relation to the objective.		
6. Employment	Baseline evidence recognises that the high level of employment in inner London is exceptional when compared with the wider UK and is predominantly focussed in the concentration of high value business and financial service sector jobs. The existing London Plan is likely to continue to have a positive effect in ensuring a wide range of employment opportunities are developed in inner London. .	Employment rates in outer London are broadly comparable with the national average. Indeed, the Outer London Commission recognises that outer London competes far more with the outer metropolitan area, encompassing areas of the South East and East of England regions that border Greater London, than it does with central London. Consequently, this option will help attract businesses to outer London, which will help provide a range of employment for residents in outer London across a more diverse range of sectors and skill levels.	
7. Stable Economy	It is recognised that the make up of economic activity in outer London is relatively similar to that across the wider UK, although there is a strong presence of certain industries within inner London which are not found to the same extent elsewhere, notably financial services, business services, media and publishing, consumer spending and government. This option emphasises ensuring economic development within inner London by supporting regeneration activities in deprived areas there. This is likely to attract business opportunities and will help support a stable economy.	In addition to the effects of Option 1, this option is likely to positively support economic development in outer London. The focus on metropolitan town centres is likely to ensure that investment is focussed on supporting local economic hubs in outer London, which is likely to have a positive effect. It is also likely to support small and medium sized businesses which may benefit from the lower rents available in outer London. This may have a positive effect on encouraging new sectors to establish or locate to such areas (such as green and creative industries, public and knowledge sectors and logistic services).	In addition to the effects of Option 1, this option is likely to enhance economic development in outer London. However, it is considered that focussing economic development at strategic development centres in outer London, could limit the positive effects in comparison with Option 2..
8. Flood Risk and Climate Change	<p>Much of the flood risk in London is concentrated in central and inner London along the River Thames and its tributaries, although flood risk also occurs from surface flooding, particularly following periods of intensive precipitation. However, measures exist in the current London Plan to adapt to flood risk and climatic changes. Consequently, it is recommended that such policies are retained to minimise any potential detrimental effects.</p> <p>Furthermore, inner London (in particular) suffers from the urban heat island effect due to the higher concentration of thermal mass (roads and buildings) that absorb solar radiation, and the lower amounts of open space and vegetation that help provide shade and cool ambient air temperature. Further development in inner London may exacerbate the urban heat island effect.</p>		

Option	Strategic Spatial Option 1	Strategic Spatial Option 2	Strategic Spatial Option 3
	However, the London Plan contains policies that seek to address such issues, such as Policies 4A.9 and 4A.10. Consequently, they should be retained to minimise detrimental effects.		
9. Climate Change Mitigation and Energy	The emphasis of the geographic distribution of growth within London is unlikely to have a significant effect on climate change mitigation or energy policy as such policies apply regardless of the geographic location of development.		
10. Water Quality and Water Resources	Development is likely to affect the consumption of water resources and use of the Blue Ribbon Network (e.g. for freight transport), which may affect water quality, and is not considered to be dependent on inner or outer London locations.		
11. Waste	The generation of waste is generally unrelated to the location of spatial development. Consequently, there is unlikely to be a significant effect of the spatial development options against this objective.		
12. Accessibility and Mobility	The existing London Plan contains a number of policies aimed at improving accessibility to and within London. It is anticipated that the use of public transport will continue to grow as development occurs in central and inner London. The concentration of economic development in inner London is likely to be beneficial towards the objective as there is already a high level of public transport provision in the area.	The development of growth in outer London (either around metropolitan town centres or at strategic development centres) is likely to have a positive effect on reducing the distances required to travel as more employment opportunities and social facilities are likely to be available in outer London. Reducing the distances travelled may encourage more people to cycle locally or walk. Initial TfL analysis indicates that crowding on public transport may reduce by up to 39% compared to the 2006 base rate as a result of enhanced development at metropolitan town centres. However, there may well be an increase in the number of private vehicles, due to the greater availability of parking spaces compared with inner London, access to the wider road network and the absence of the congestion charge. Research by the Outer London Commission has indicated that if inadequate public transport is provided to and around the strategic development centres then there may well be an increase in car use and a rise in congestion in such areas.	
13. Built and Historic Environment	Growth across London is likely to result in an intensification of development. This is may result in an increase in pressure on historic assets and their contextual setting which contribute to the local sense of place. However, the encouragement of investment may contribute to the appropriate restoration or enhancement of heritage assets and their contexts that could provide revived focal points within the town centres (e.g. historic parks and gardens or locally listed buildings).		
14. Liveability and Place	The existing London Plan largely promotes economic development in central and inner London. This may require those living in outer London to commute to their respective	There is likely to be a positive effect as a result of encouraging the development of a range of facilities to support the community, including employment and	This option may help to encourage sustainable communities by increasing the range and provision of employment opportunities in outer London, thereby reducing the

Option	Strategic Spatial Option 1	Strategic Spatial Option 2	Strategic Spatial Option 3
	places of work and can create areas of 'dormitory' suburbs in outer London and surrounding areas.	commercial opportunities. By promoting the local economy, it is likely that the metropolitan town centres will become an increasing focus for wider residential areas in outer London that may help to increase a sense of place. However, liveability and sense of place equates to more than just employment and housing developments. There may be an increase pressure on social and recreational facilities, although extra capacity may be provided. The strategic option may also contribute to the sustainability of such places by reducing the need and distance to travel, enabling people to spend more time pursuing recreational activities such as sports and achieving a healthier work-life balance.	distances required to travel to work. This may enable people to spend more time pursuing recreational activities such as sports and achieve a healthier work-life balance. By promoting the local economy the development centre is likely to become an increasing focus for the community and may well develop its own unique sense of place depending on its position to the north, south, east or west of the city. However, this strategic option may concentrate developments in and around strategic development centres. This could result in a dilution of any existing sense of place. Additionally, as identified by the Outer London Commission Report, this option may undermine the liveability and investment in other areas in outer London.
15. Open Space	The intensification of development across London (whether inner or outer) will increase the pressure on existing accessible open spaces, particular as the number of brownfield and derelict sites decreases through the lifetime of the plan. The loss of such sites may also contribute to a loss of green infrastructure, although new green infrastructure may be incorporated within any new developments, e.g. green roofs. However, policies in the existing London plan seek to protect open space and should be retained in the draft replacement London Plan.		
16. Air Quality	Air quality has improved under the current London Plan, although it continues to exceed EU and national based targets across much of London. Air quality is particularly poor in central and inner London. It is anticipated that improvements in emissions from vehicles may help improve air quality, although the extent to which this will happen is uncertain.	The intensification of development in metropolitan towns in outer London may help to improve air quality by providing employment opportunities in outer London. This may help reduce the distances travelled to work and encourage the use of more sustainable, less polluting transport modes such as cycling or public transport. However, the intensification of development in outer London may increase the level of pollution around the town centres.	The promotion of strategic development centres may help to improve air quality by providing employment opportunities in outer London. This may help reduce the distances travelled to work and could help to encourage the use of more sustainable modes of transport to commute to and from work. However, the intensification of development in outer London may increase the levels of pollutant emissions, particularly around the strategic development centres, due to the concentration of activity.
Summary	This option will continue to positively contribute towards the achievement of a number of objectives within inner London. Against some objectives there is no clear differentiation	This option is likely to positively contribute towards the objectives as in Option 1. However, it is also likely to support greater improvements in outer London by promoting	This option is likely to positively contribute towards the objectives. It is also likely to give rise to improvements in outer London, although perhaps not to the extent of Option 2

Option	Strategic Spatial Option 1	Strategic Spatial Option 2	Strategic Spatial Option 3
	between the strategic spatial options as the spatial location of development is not a key factor.	the development and enhancements of local communities around metropolitan town centres.	if development is focussed on strategic development centres rather than existing town centres that support local communities and have existing social infrastructure. However, strategic development centres may be more appropriate for certain types of economic development and activity than metropolitan town centres (e.g. distribution and logistics or industrial/manufacturing activities).

The assessment highlights that generally, of the options considered here the second is likely to contribute most towards meeting the IIA objectives. This is predominantly due to the fact that it builds upon the existing London Plan's focus on inner London and promotes an improved distribution of development in outer London by focussing on enhancing growth at metropolitan town centres. This is anticipated to build upon local economies and maximise the availability of opportunities in outer London.

At this strategic level, the main effects of alternative spatial distributions of development can be summarised as follows:

Strategic Spatial Option 1: No change, business as usual scenario

The effective continuation of the existing London Plan is likely to lead to a continued improvement against many of the sustainability objectives. However, whilst there have been improvements in recent years against monitored targets such as the unemployment rate, the gap between ethnic minorities and the national average remains relatively similar. This option is also unlikely to fully address the issues of disadvantage in outer London, or heighten its competitiveness with the Outer Metropolitan Area.

Strategic Spatial Option 2: Current London Plan direction plus enhanced growth in metropolitan town centres

In addition to the continued growth and development of inner London (highlighted in Option 1), the focus of enhanced growth in metropolitan town centres in outer London is likely to have a number of positive effects against the IIA objectives. In particular, the enhancement of commercial opportunities in outer London is likely to be beneficial for the economy, and reducing the distances of travel required by the population of outer London to attend work, which in turn may help alleviate some pressure on the transport infrastructure into outer London. It may also help revitalise town centres and provide access to more house as well as help disadvantaged communities.

Strategic Spatial Option 3: Current London Plan direction plus enhanced growth in new strategic outer London development centres

Enhanced growth in new strategic outer London development centres in addition to inner London (highlighted in Option 1 above) has the potential to encourage new employment and economic opportunities in outer London. Focussing the growth around selected strategic development centres may help improve the accessibility of opportunities and social infrastructure for outer London's population, although not necessarily to the same extent as strategic spatial Option 2 if development is focussed at existing town centres. However, strategic development centres may be more appropriate for certain types of economic activity (e.g. logistics, distribution, industrial/mechanical activities).

5.1.4 Conclusions

It is recognised that the existing London Plan performs in a broadly positive way in relation to the IIA objectives, although there is a predominant focus on inner London. It is noted that the Plan contains a number of policies that provide protection to various aspects of the environment that mitigate effects that may otherwise arise. For example, policies encourage improved resource use, lower energy consumption and reduced CO₂ emissions from new developments. As such, it is considered that it would be beneficial if the current policies are retained within the draft replacement London Plan and a greater focus on outer London development is included. It is considered that a hybrid of options 2 and 3 would be beneficial for London. Where possible, strategic outer London development centres should be pursued, as long as they do not place undue pressure on infrastructure and the environment in London and the surrounding area. The policies in Chapter 2 of the draft replacement London Plan take on board the benefits of each of the distinct options presented and express these as the preferred spatial development options for London's growth. This represents a development of the options emphasising the importance of metropolitan and other town centres as development locations, while also recognising a role for other strategic development centres able to support new activities and sectors in outer London.

5.2 Summary of the effects of Chapter 2 (London's Places)

Chapter 2 (London's Places) contains 18 policies that set out the basis for planning for London's projected population and economic growth until 2031. These policies range from the strategic, place setting policies to the identification of areas for regeneration and development, both in terms of housing and employment provision. In addition, Chapter 2 outlines policies for focussing on the different challenges faced by outer London, inner London and the CAZ, and takes forward the preferred strategic spatial development option assessed above.

The key effects arising from the Chapter's policies are generally positive. This is due to the fact that the policies set out measures to shape London in a sustainable way and promote a sustainable urban form. Additionally, it contains policies that support economic and social infrastructure in appropriate locations across London. For example, policies protect Strategic Industrial Locations to provide areas for a range of economic activities including servicing transport infrastructure, logistics and manufacturing. Similarly, growth areas are promoted by policies to support the development of communities to meet the projected growth of the population. Policies seek to protect and enhance inner London and the CAZ, bringing a number of benefits to deprived communities, whilst greater emphasis is given to outer London to support the economic development of town centres and maximise the availability of opportunities to residents in such areas.

It is acknowledged that the policies in Chapter 2 will be applied in conjunction with the rest of the plan, which will mitigate any areas not directly covered or addressed, or which may be affected if the policies were implemented in isolation.

There are objectives against which no significant effects are anticipated to arise from Chapter 2's policies, such as against the climate change, water quality and resources, waste, the built and historic environment, and air quality. This is due to the fact that any potential negative effects are likely to have been mitigated by policies elsewhere in

the draft replacement London Plan. Consequently, the assessment focuses on the identification of the key significant effects, or highlights individual policies that are of relevance to an objective. Further information is outlined in the Policy Assessment Matrix in Appendix I.

5.3 Assessment of Chapter 2 (London's Places)

1. Regeneration & Land-Use: To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities.

A number of policies were anticipated to have a significant positive effect on regeneration and land-use, in particular Policies 2.3, 2.4 and 2.13 to 2.17. These promote regeneration and urban renaissance through the encouragement of investment across London. In particular, the policies seek to target investment in areas identified within the plan (such as the Thames Gateway highlighted in Policy 2.3). Chapter 2 is also likely to support regeneration as a result of the coordinated approach promoted to ensure that appropriate resources for transport and other infrastructure is made available to support the optimum benefits from development.

KEY EFFECTS:

The policies that make reference to more specific locations (e.g. town centres) are anticipated to have a positive effect towards regeneration. In particular, the focus of investment in areas to ensure that supporting infrastructure (such as transport) is in place to optimise the benefits of development is likely to contribute significantly towards the objective.

Furthermore, Policy 2.4 (The 2012 Games and their legacy) encourages regeneration through significant investment in East London. A Supplementary Planning Guidance (SPG) document is likely to ensure that the legacy of the investment for the Olympic and Paralympic Games is maximised for the benefit of local communities. It will also clearly set out the managed release of industrial land for mixed use development, which is likely to promote sustained benefits from regeneration such as an improved public realm and employment opportunities.

2. Biodiversity: To protect, enhance and promote the natural biodiversity of London.

The policies within Chapter 2 have been examined against the objective, and no significant effects with regards to biodiversity were identified. However, Policy 2.18 (Green infrastructure: the network of open and natural spaces) may contribute towards an increased green linkage (consisting of multi-functional green and open spaces) across London that can provide a connected network for biodiversity. Indeed, Chapter 2 is based on the principle that development will be encouraged where it doesn't 'encroach on the Green Belt, or on London's open spaces' and is therefore likely to indirectly contribute towards the protection of natural biodiversity. Any issues and effects relating to biodiversity are predominantly addressed by policies elsewhere in the draft replacement London Plan, notably in Chapter 7.

3. Health and Well-being: To maximise the health and well-being of the population and reduce inequalities in health.

Chapter 2 contains a number of policies that promote London, in international, national, regional and local terms and seeks to apply a collaborative approach between neighbouring regions. Additionally, the policies recognise the differences of health between inner and outer London, with children aged 10-11 in the most deprived areas 80% more likely to become obese than in other areas of London (refer to the Health Impact

Assessment in **Appendix B**). Policy 2.1 for example states that *'the Mayor and GLA Group will ensure that London retains and extends its global role as a sustainable centre for ... health'*. This is likely to contribute positively towards the objective.

Furthermore, the Health Impact Assessment (refer to **Appendix B**) highlights that there are health inequalities in all London boroughs and the consideration given to addressing issues in outer as well as inner London is likely to contribute positively towards the objective. Indeed, Policy 2.14 (Areas for regeneration) highlights the need to combine regenerative development with improvements in skills and health. Policy 2.4 (The 2012 Games and their legacy) highlights the fact that the legacy of investment should increase participation in sport and address health inequalities.

It is anticipated that the policies in Chapter 2 will help to drive regeneration and change, which, in combination with other chapters of the plan, is likely to result in a positive effect against this objective. However, it is recognised that health and well-being is also addressed elsewhere in the London Plan (such as Policy 3.18).

KEY EFFECTS:

A number of policies within Chapter 2 are likely to help promote health and well-being and address health inequalities. However, it is recognised that policies elsewhere in the London Plan (notably in Chapter 3) will also help support improvements in health and well-being.

4. Equalities: To ensure equitable outcomes for all communities, particularly those most at risk to experience discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London.

The Mayor's vision that shapes Chapter 2 is *'A city that meets the challenges of economic and population growth ... and helps tackle the huge issue of inequality among Londoners.'* This is reflected in the accompanying text of a number of the policies within Chapter 2. The Equalities Impact Assessment (refer to **Appendix C**) highlights that many of the policies set out in Chapter 2 are likely to contribute positively towards the objective. This is due to the fact that they promote development across London, particularly in areas of disadvantage. Such development is likely to increase the opportunities for those who are most disadvantaged, particularly BAME (Black, Asian, Minority Ethnic) groups, whilst increased mobility (such as Shopmobility within town centres, included in Policy 2.15) is likely to be beneficial to disabled, elderly or frail people.

KEY EFFECTS:

The inclusion of policies promoting regeneration, development centres, opportunity sites and strategic industrial locations is anticipated to help tackle equality issues.

The outer London policies (2.6 to 2.8) seek to provide a framework for managing the population growth that is expected in outer London until 2031. If this can be achieved at the same time as tackling the inequalities between the different areas of outer London this is likely to have a positive long term effect. However, the Equalities

Impact Assessment (see **Appendix C**) highlights that the method of implementation and specific location of implementing the policy may affect the contribution towards the objective.

The policies for inner London (2.9) and the Central Activities Zone (CAZ) (2.10-2.12) set out a strategic approach to tackling the massive inequalities that exist within central London. For example, some of the most deprived wards in the UK lie beside some of the most affluent. By ensuring that there is adequate provision of social infrastructure for the local community as well as for visitors in the CAZ, there may well be a positive effect on reducing inequalities.

The identification of areas for opportunity and intensification and for regeneration is anticipated to provide opportunities to develop and regenerate areas of brownfield land and currently run-down areas. It is anticipated that this scale of regeneration, if well designed to include the tackling of inequality as a core design principle, should have a positive effect in the medium to long term (as an increasing number of opportunity, intensification and regeneration areas are brought forward).

The focus of Policy 2.15 on town centres is likely to have a positive effect against the equality objective through the fostering of neighbourhoods, the use of inclusive design and the development of retail opportunities, which is likely to promote a range of diverse and locally owned shops. Indeed many independent shops are owned by BAME groups.

Overall it is anticipated, in conjunction with other elements of the plan that there would be a positive effect against the equalities objective.

5. Housing: To ensure that all Londoners have access to good quality, well-located, affordable housing.

London's population is predicted to increase from 7.56 million to 8.89 million by 2031. This population growth will increase the demand for homes. A number of policies in this chapter seek to address the growth in demand for housing, although it is noted that housing issues are predominantly addressed by policies in Chapter 3.

KEY EFFECTS:

A number of policies identify areas for housing growth. These are anticipated to contribute positively towards the housing objective. It is noted that housing issues are also addressed by policies in Chapter 3.

The identification of regeneration areas (Policy 2.14), opportunity and intensification areas (2.13) and town centres (2.15) is anticipated to have a positive effect by specifically identifying and encouraging housing development in such areas. Similarly, mixed use developments are promoted in outer London locations, which are likely to help support the provision of housing.

Policy 2.11 includes a requirement for proposals to increase office floor-space within the CAZ to include a mix of uses including housing. This is anticipated to contribute positively towards the housing objective, particularly where the development can contribute to the creation or development of a sense of community and neighbourhood.

Overall, it is anticipated that the chapter will positively contribute towards the housing objective. Many of the positives arising by these policies are likely to be further enhanced by other policies within the London Plan.

6. Employment: To offer everyone the opportunity for rewarding, well-located and satisfying employment.

It is projected that in the long term, London's economy will continue to grow with business, financial and other service industries providing the greatest rise in employment opportunities. Chapter 2 of the London Plan aims to help facilitate this growth through the strengthening of London's position as a leading global city for business, innovation, creativity, health, education and research (Policy 2.1). London's position within the network of European and British cities is important to its economic success and it is anticipated that the recognition of this in Policy 2.1 will contribute to securing businesses and therefore employment opportunities within London (economic and employment issues are addressed in more detail by policies in Chapter 4, and that they should be read in conjunction with the policies in this chapter).

KEY EFFECTS:

The policies within the chapter are anticipated to help to facilitate the development of further employment opportunities throughout London. These positive effects are likely to compliment and support related policies set out in Chapter 4.

London's position in relation to neighbouring regions and within the wider UK context is also important in securing employment opportunities by attracting businesses to locate and invest here. The identification of growth areas and co-ordination corridors is anticipated to be beneficial due to the fact that it will help guide increased investment to parts of London with potential for growth and which will benefit from development and the employment opportunities associated with it. The development of areas of outer London both as residential areas and as employment centres (Policy 2.7) is anticipated to have a positive effect by ensuring a greater provision of employment opportunities in outer London, which competes more with the Outer Metropolitan Areas than inner London. This will help residents of outer London to access a wider range of suitable employment opportunities. In particular, it is likely to benefit higher skilled workers for whom employment opportunities are generally focused in inner London or in the Outer Metropolitan Area, and who consequently tend to commute further to work. Conversely, employment opportunities for lower skilled workers are generally located throughout London, particularly in outer London locations where more industrial activities occur (GLA Economics (2009) *Working Paper 36 – Commuting Patterns in London by Qualification Level and Employment Location*, GLA, London).

The identification of areas with the potential for regeneration and development (policies 2.13 to 2.17) are anticipated to help deliver employment opportunities across London. Such policies are likely to encourage investment that will lead employment opportunities in some of the most deprived parts of London, particularly to the East.

Policies 2.10 to 2.12 focus on the CAZ, which is the geographic and economic core of London. Preservation of the elements of the CAZ, which have made it such a key employment area in London, is central to these policies and it is anticipated that the promotion and enhancement of the CAZ will help to generate further employment and continue to make London a key global city.

Overall it is anticipated that there will be a positive effect against employment as a result of the Chapter 2 policies.

7. Stable Economy: To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.

The policies set out in Chapter 2 are likely to contribute towards tackling the economic challenges facing the region. The importance of reinforcing London's position in a regional, national and international setting is important since the relationship with other cities and regions is a key component of London's economic success.

KEY EFFECTS:

The policies within the chapter seek to promote regeneration that is likely to support a stable economy. As such, it is anticipated that Chapter 2 will have a positive effect against this objective.

The identification of growth areas and regeneration areas highlighted within the policies of Chapter 2 provide a framework for more specific economic policies set out in Chapter 4. There is likely to be a positive effect against this objective as a number of policies focus investment in areas that have the potential to deliver significant economic improvements to areas that are under utilised or historically deprived. The identification of broad areas for employment, development and regeneration should help to ensure that appropriate markets are also available (e.g. local communities to supply labour or consume goods and services on offer). This is likely to contribute positively towards achieving a stable economy.

The effects of the Chapter 2 policies on the protection and promotion of a stable economy are likely to be positive with the promotion of areas for development and regeneration, the protection of the unique qualities which characterise London and the strengthening of inter regional, city and national ties.

8. Flood Risk and Climate Change Adaptation: To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.

The policies in this chapter have been examined against the objective but no significant effects were identified. However, there may be a minor positive effect due to the fact that this chapter is anticipated to contribute to developing regional relationships. These are considered to be important in dealing with this trans-regional issue. Similarly, Policy 2.18 promotes green infrastructure. This promotes increases in vegetation and open space, which can help to reduce surface run off rates, thereby alleviating pressure on drainage systems and reduce the risk of flooding.

9. Climate Change Mitigation and Energy: To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.

The policies in this chapter have been examined against the objective but no significant effects were identified.

10. Water Quality & Water Resources: To protect and enhance London's waterbodies and the Blue Ribbon Network.

The policies in this chapter have been examined against the objective but no significant effects were identified.

11. Waste: To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.

The policies in this chapter have been examined against the objective but no significant effects were identified. However, it is noted that Policy 2.17 is designed to protect Strategic Industrial Locations (SILs) for activities that includes the management of waste. This is important to enable London to maximise its self-sufficiency with regards to waste management and is therefore likely to contribute positively towards the objective.

12. Accessibility and Mobility: To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).

Policy 2.2 promotes working with neighbouring regional, sub-regional and local authorities to manage growth in the south east, while Policy 2.3 seeks to promote growth areas and co-ordination corridors. Indeed, Policy 2.3 specifically states that appropriate resources for transport will be made available to support and optimise development in growth areas. Additionally, the development in such areas will seek to rationalise commuting patterns, which is likely to contribute positively towards the objective.

KEY EFFECTS:

This chapter is likely to contribute positively towards the objective by promoting transport and accessibility within growth areas and outer London. Accessibility and mobility issues are more specifically addressed by policies within Chapter 6.

Policies 2.6 to 2.8 seek to tackle the issues of transport in outer London. In particular, Policy 2.8 promotes more integrated and accessible transport to meet the needs of outer London residents. The focus on ensuring that there is adequate transport capacity to service the projected and planned growth in outer London is likely to contribute positively to the objective. Indeed, the proposed 'hub and spoke' approach will focus on creating a network of public transport between town centres and is anticipated to help improve accessibility for residents to access employment opportunities as well as local services (Outer London Commission (2009) *The Mayor's Outer London Commission: Interim Conclusions*, OLC, London).

Policy 2.10 and 2.11 relate to the CAZ. Both policies recognise the importance of improving linkages between the CAZ and the labour market, as well as the importance of completing essential new transport schemes such as Crossrail. These policies are likely to contribute positively towards the objective as they seek to improve access to and across the centre of London. Furthermore, Policy 2.15 (Town centres) seeks to improve the accessibility of town centres by promoting development that encourages walking, cycling or access by public transport. Shopmobility schemes are also encouraged, which are likely to contribute positively to improving the accessibility of facilities and services by, and the mobility of, people.

Overall this chapter is anticipated to have a positive effect on accessibility and mobility. Additional policies that address more specific transport issues are set out in Chapter 6 of the draft replacement London Plan.

13. Built and Historic Environment: To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces and appropriately designed.

The policies in this chapter have been examined against the objective but no significant effects were identified. . However, it is noted that Policy 2.10 (CAZ – Strategic priorities) highlights the importance sustaining and enhancing the distinctive heritage in the CAZ, including internationally designated sites (World Heritage Sites) through to local features such as the public realm and smaller open spaces, which is likely to contribute positively towards the objective.

14. Liveability and Place: To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.

Meeting the challenge of creating a liveable environment for all Londoners is one of the key objectives of the plan and a number of the policies within Chapter 2 contribute towards this objective, in particular, the outer London policies (2.6-2.8). Indeed, one of the key aims of Policy 2.8 is to enhance the quality of life in outer London for present and future residents. Similarly, Policy 2.9 promotes inner London and includes a strategic aim of improving inner London's distinct environment, addressing the concentration of deprived areas and improving the quality of life for those living there. In combination, these policies are anticipated to contribute positively towards the objective.

KEY EFFECTS:

A number of policies promote quality of life within various areas of London, as well as protecting and enhancing the existing diversity and character. Further policies that address liveability and sense of place are set out in Chapter 7.

Policy 2.12 focuses on the improvement of the CAZ for local residents and is likely to contribute positively towards the objective as it seeks to protect and enhance neighbourhoods. Policies 2.13 to 2.16 promote development across London in key opportunity sites, areas for regeneration, town centres and strategic outer London development centres. In combination with relevant policies set out in Chapter 7 that seek to enhance liveability and sense of place, there is likely to be a significantly positive effect towards the objective.

The inclusion of Policy 2.18 is likely to have a positive effect on liveability and sense of place by promoting green infrastructure. This contributes not only to biodiversity but also to enhancing the character of an area and sense of place, as well as recreation areas that can enhance local liveability.

15. Open Space: To protect and enhance natural open space in London.

The policies in this chapter have been examined against the objective but no significant effects were identified. However, it is noted that Policy 2.18 (Green infrastructure) is anticipated to contribute positively towards the protection and enhancement of open space in London. Similarly, Policy 2.10 is also likely to contribute positively to the protection of open space within the CAZ, where access to open spaces is relatively limited.

16. Air Quality: To improve London's air quality.

The policies in this chapter have been examined against the objective but no significant effects were identified.

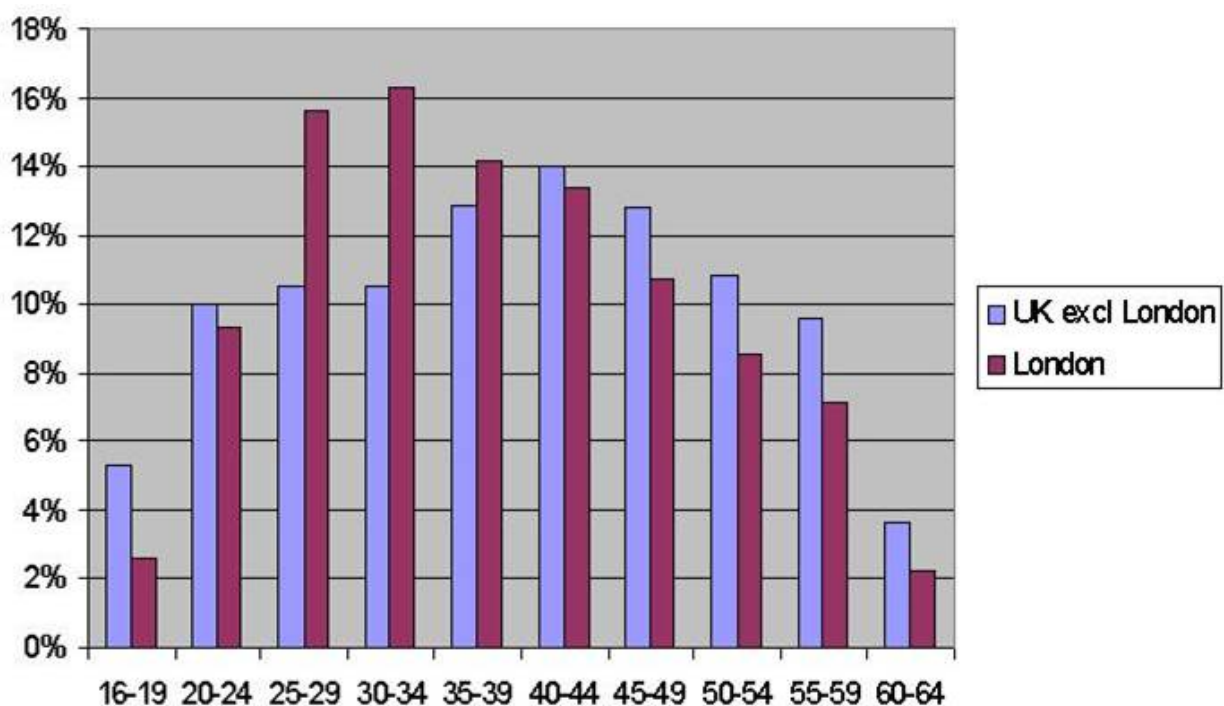
6. Assessment of Chapter 3 (London's People)

6.1 Summary of Policies in Chapter 3 (London's People)

6.1.1 Baseline Summary

London is currently home to approximately 7.56 million people, of which 50.6 per cent are female and 49.4 per cent are male. London differs from the rest of the UK in terms of age structure with the population tending to be younger than the country as a whole. For example, **Figure 6.1** below shows how London's working age population (between 16 and 64 years) has a higher share of 25-39 year olds compared to the rest of the UK. This is mainly due to the large net inflow of young domestic migrants (mostly highly skilled) from the rest of the UK into London.

Figure 6.1 Residents in employment by age group

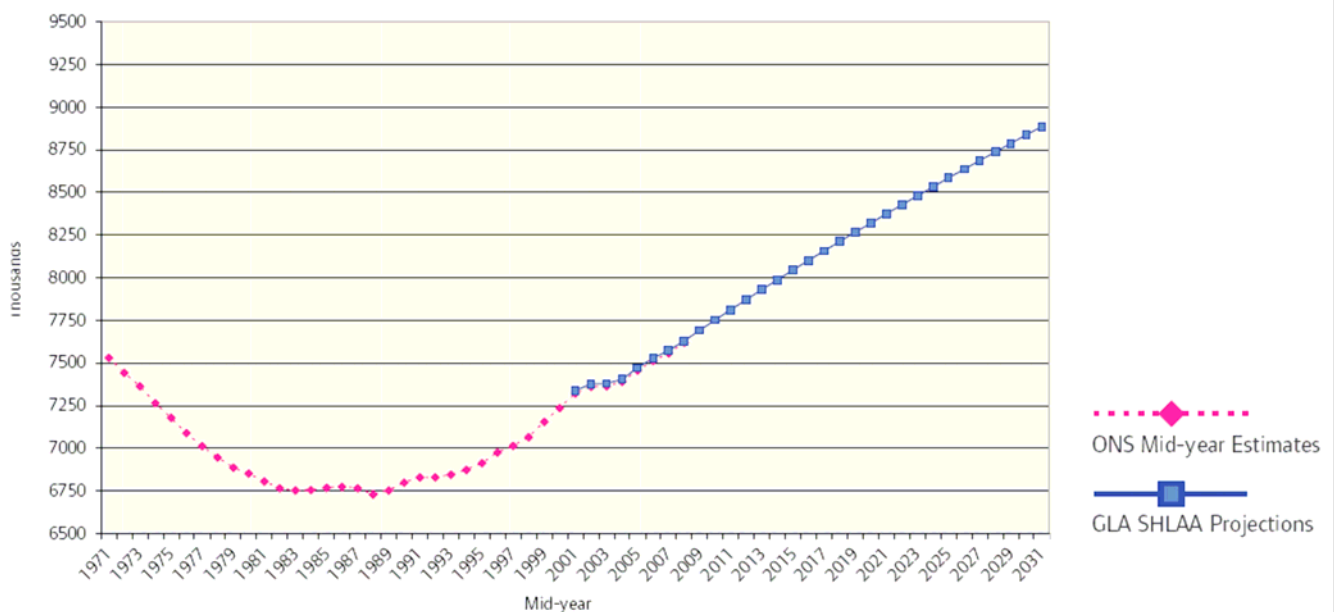


Population growth is an important consideration for the London Plan and has a major influence on policy development. The likely evolution of the baseline population is important to understand but ultimately it remains substantially beyond London Plan policy. The key contributors to population growth in London are related to natural growth and migration. London accounts for 41 per cent of natural population growth in England and Wales (2007 figures). At present, London has two-and-a-half times as many births as deaths. In five of the past six years the capital has had net migration losses, but has also gained significantly from overseas.

It is too early to say what effect the current recession might have on migration, however, London's experience in the 1990s shows that economic downturns have little effect on fertility rates. Unless something happens to reverse the population growth trends related to natural growth and migration, it seems likely that London will have to plan for continued population growth to 2031.

The latest GLA population projections show that this period is likely to see growth from the present level of 7.63 million to an estimated 7.81 million by 2011, 8.10 million by 2016, 8.37 million by 2021 and 8.63 million by 2026. Eventually, by 2031 London's population may increase to 8.89 million. These projections are shown in **Figure 6.2**.

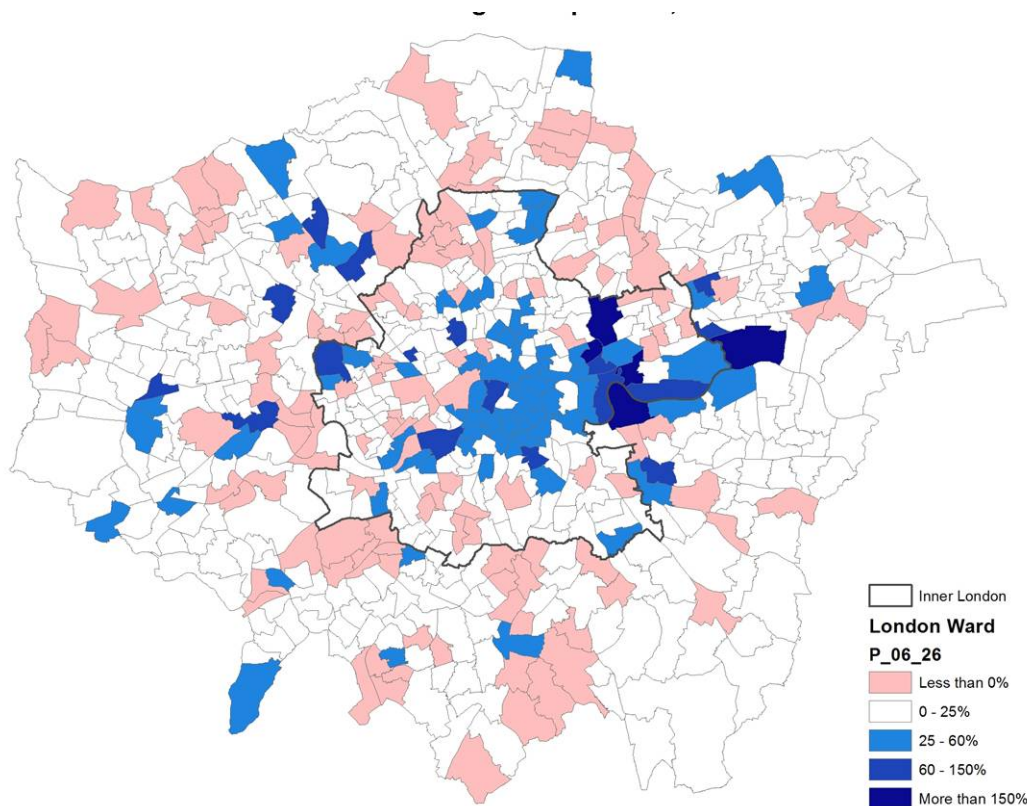
Figure 6.2 London Population projections 2008 to 2031



Source: GLA DMAG

Although it is based on an earlier set of projections **Figure 6.3** provides an indication of where projected population growth is likely to be distributed spatially within the wards of London. The distribution highlights that the most significant growth is likely to be focused on London's central and eastern areas, with other various pockets of growth in outer London.

Figure 6.3 Map Showing Forecast Change in Population 2006 to 2026 (percentage by ward)



These projections envisage that London will continue to be younger than elsewhere in England and Wales, and that there will be more school age Londoners and more aged 35-74 in 2031. It is also expected that there will be significantly more people in their nineties as life expectancy improves on the back of medical advances, improvements in lifestyles and new technologies. Therefore, between now and 2031 there will be higher demand for the schools and other facilities needed by a growing number of younger people, and also increasing needs of an ageing population. A growing population, with an expected increase of around 270,000 older Londoners by 2031, is also likely to mean there will be more disabled people and people with particular mobility and access needs.

Black, Asian and other minority ethnic communities are expected to grow strongly as a result of natural growth and continued in-migration from overseas. Between 2007 and 2031, six London boroughs are likely to have more than half their population coming from these groups, with Harrow, Redbridge, Tower Hamlets, Ealing, Hounslow and Croydon joining Brent and Newham which already had such a majority in 2001.

The most recent data (2004-06) shows males in London have an average life expectancy at birth of 77.4, which has increased from 73.9 in 1994-96. For females average life expectancy increased from 79.7 in 1994-96 to 82.0 in 2004-06. All English regions have seen an increase in life expectancy over the decade. However, the largest increases for both males and females are in London.

The highest average life expectancies in London (and in also for England and Wales as a whole) are in Kensington and Chelsea, where expectancy for men is 83.1 years and for women is 87.2 years. The boroughs with the lowest life expectancy in London are Islington for males (74.9 years) and Newham for females (79.4 years).

This represents a good indicator of the health of Londoners, however, individual choice play an important part for people to maintain a health and active lifestyle. How much exercise people take, the food they eat, the levels of alcohol people drink are all important factors for individual health. These choices are made within the physical, social and economic environment.

The level of poverty in London, particularly child poverty, is a major long-term cause of health inequalities across the city. Levels of poverty and deprivation correlate closely with levels of poor health. People's employment status and the nature of their work also have a direct bearing on their physical and mental health, and even on their life expectancy. Across London different boroughs have different average life expectancies dependent in part on the number of deprived neighbourhoods they contain.

Londoners' self-reported health is slightly better than the national average for England. However, there are significant health inequalities within London. Areas such as Tower Hamlets, Hackney and Newham report high rates of poor health. Most of the areas with low levels of male and female reported good health are located in inner London. There are also wide variations in the percentage reporting their health as not good by ethnic group. The percentage who reported their health as not good was highest in the Asian, British, Bangladeshi and Pakistani groups and was also high in the Indian and Black Caribbean groups.

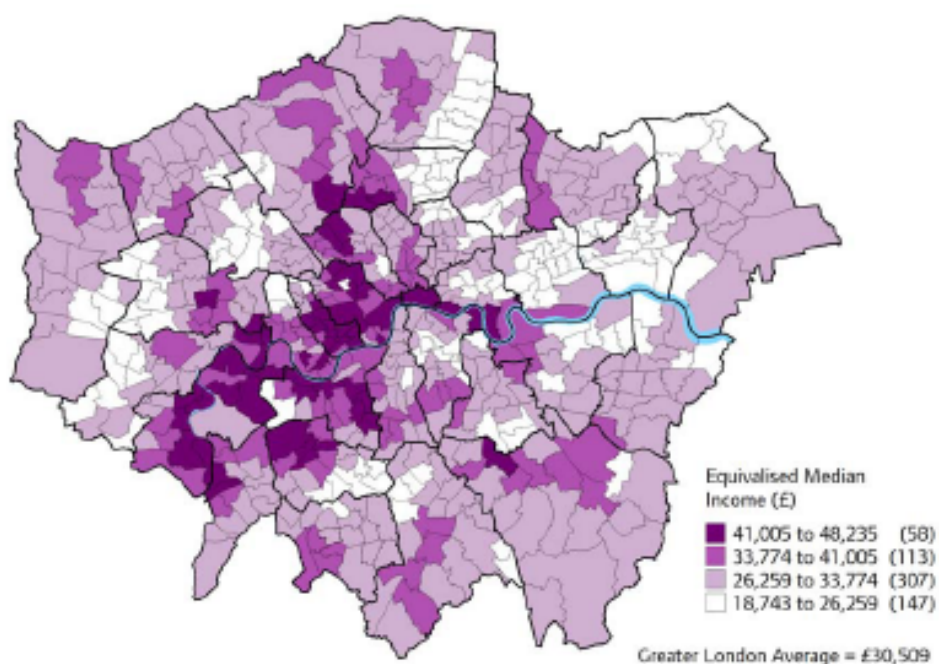
In terms of infant mortality rate (IMR), London is very similar to the rest of the country. The IMR in London as a whole has declined from 7.3 per 1,000 in 1990-92 to 5.7 per 1,000 in 2000-02. As with self-reported health there are considerable inequalities in infant mortality by borough. Brent, Lambeth, Southwark, Newham, Hackney and Waltham Forest had the highest rates, which along with Croydon were significantly higher than the England rate.

London's economy has generally been successful over the past twenty years (see next section), however, not everyone has benefited and levels of poverty have not reduced. Income poverty rates for children, working age adults and pensioners are higher in London than elsewhere in the UK. A quarter of working age adults, and 41 per cent of children are in poverty after housing costs are taken into account and poverty is particularly concentrated in households with dependent children (working age people without children have poverty rates similar to those in the rest of the country).

As a result of this London is an increasingly polarised city. Deprivation is concentrated among Black, Asian and ethnic minority and disabled Londoners. Deprivation tends to be geographically concentrated and is therefore an important consideration for the London Plan (see **Figure 5.6**, page 34).

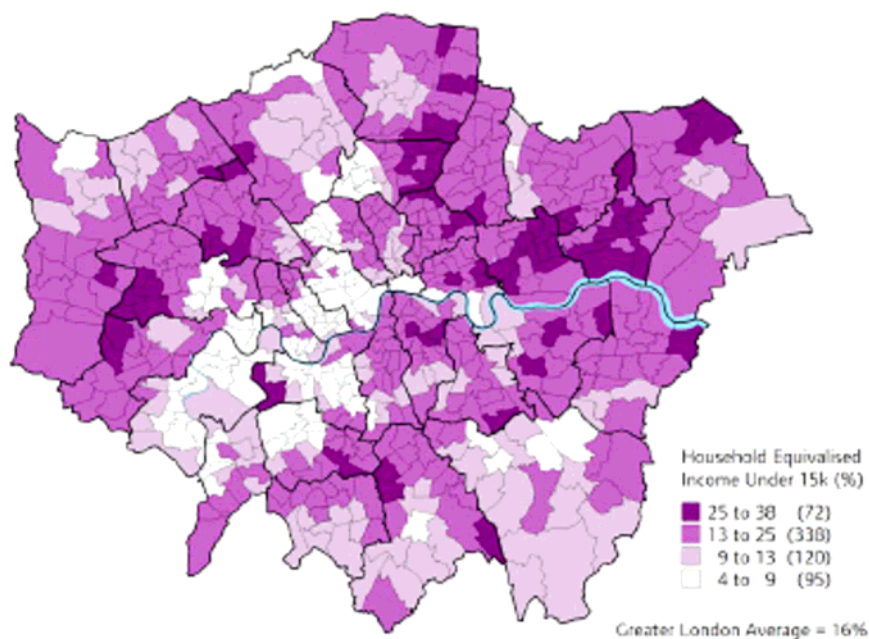
For some groups there has been a major growth in earnings, with significant rises in the number of those earning high salaries and in the amount they earn. Again there are distinct geographic concentrations of those on high incomes, as shown in **Figure 6.4**.

Figure 6.4 Map Showing Household Median Income (by ward 2008)



However, this increase in earnings for some leaves those on low incomes, or those without employment, further behind. **Figure 6.5** shows the concentration of those households on a median income of less than £15,000 per year, which provides a similar spatial distribution to deprivation highlighted in **Figure 5.6** (page 34).

Figure 6.5 Map Showing Household with median income under £15k per year (by ward 2008)



London is still a very expensive place to live, a particular problem for those on low incomes. The high cost of housing in London is a major contributor to this problem. The result can be that those with lower incomes find it very difficult to access the housing they need, with many having no option but to seek social housing. This in turn can lead to social housing and deprivation being closely linked. There is a close correlation between housing tenure and deprivation in London, and people have increasing difficulty in moving on from social into other forms of housing.

The forecast growth in population will also mean a growth in the number of households and increased demand for housing. From the current number of London households (3.18 million in mid-2007), the period is likely to see growth to 3.33 – 3.37 million households by 2011, 3.48 – 3.57 million by 2016, 3.67 – 3.75 million by 2021 and 3.79 – 3.93 million by 2026. By 2031 the number of households may be between 3.90 and 4.04 million. It is likely that social trends will also contribute to the increase in household numbers. The period to 2031 is likely to see a decrease in the number of married couples, more than offset by increase in cohabiting couples. There is likely to be a large increase in one-person households, particularly among middle-aged people, and in lone parent and other multi-adult but non-family based households.

In consideration of these factors above, the GLA's new Strategic Housing Market Assessment (SHMA) indicates that 33,000 new homes are required each year – a figure close to that in the existing London Plan and just below the figure suggested by the National Housing and Planning Advice Unit of between 34,000 (a figure based on meeting housing need) and 43,000 (based on a long-term target for the affordability of market housing).

Housing provision has increased in London over the last two decades. Over the last two years output has been close to the current London Plan annual target of 30,500 but is expected to drop off significantly in line with the current economic cycle (see Section 3.1 of the London Housing Strategy Evidence Base for further information on expected housing growth). The latest London Plan Annual Monitoring Report shows that in the year 2007/08 28,199 net additional homes were provided in London. This is 92 per cent of the London Plan annual target (30,500), however, this is lower than the previous year 2006/07 when 31,432 new homes were provided. A positive trend in recent years has been a steady increase in affordable housing provision with 10,394 net affordable housing completions in 2007/08 over the 8,829 net completions in 2006/07.

London requires a more diverse housing supply to help meet the varied requirements of its different communities. In particular, there is a growing need for more intermediate housing options (such as low-cost home ownership) for potential first time buyers and those priced out of the housing market and for more family sized homes. Failure in the past to provide enough family sized homes, particularly affordable family sized homes, has also led to significant increases in overcrowding in London (also see Page 23 of the London Housing Strategy Evidence base). These conditions are expected to worsen without adequate policy interventions.

There are currently 84,000 empty homes in London (2.7% of total stock) of which approximately 35,000 have been empty for more than 6 months. Whilst this is the lowest number in the capital since the 1970s, it represents a major pool of housing that could be tapped to help improve the supply of new homes.

Key Baseline:

- With over 7.5 million residents, London has the second largest population of any British region, only exceeded by the South East and accounts for 12.4% of the UK population (Source: Focus on London 2008 - Chapter 1: Population & Migration).
- London is home to over 1.8 million children and young people under the age of 20, accounting for almost 24% of London's total population. Over 15.4% of London's population – 1.17 million people - are aged 60 or over (Source: GLA, The Mayor's Annual Equalities Report State of Equality in London Report).
- In 2007, lower quartile house prices in London were over 9 times the lower quartile earnings, compared with around 4 times in 1997 (Source: Focus on London 2008 - Chapter 8: Housing).
- The number of households newly accepted as statutorily homeless has fallen by almost a half, from 30,080 in 2003/04 to 15,390 in 2006/07 (Source: Focus on London 2008 - Chapter 8: Housing).
- Conventional housing supply (new build, conversions and changes of use) has risen strongly in London since the turn of the century, up from 17,130 in 1999 to 27,290 in 2006/07 (Source: Focus on London 2008 - Chapter 8: Housing).
- Life expectancy in 2005-07 is 82.4 years for women (80.8 years in 2000 – 2002) and 77.9 years for men (75.8 years in 2000-2002) (Source: GLA, The Mayor's Annual Equalities Report State of Equality in London Report).
- 20% of Londoners reported participating in at least 30 minutes of moderate exercise three times a week (Source: Sport England's Active People Survey, 2007-2008).
- The average price of a house in London was £307,071 in December 2008, this was down 12.9% from the start of the year. The average price is almost double that of the England & Wales average (£158,946) (Source: London Housing Market Report. Greater London Authority, 2009).
- Net conventional housing supply in London has increased year on year since 2003, with around 27,600 homes completed in 2007/08, marginally more than the year before (Source: London Housing Market Report. Greater London Authority, 2009).
- Over 28% of London falls within the most deprived 20% of England. The most deprived areas within London are concentrated in Inner London to the north and east of the City, from Newham to Islington and from Tower Hamlets (Source: Indices of Deprivation 2007: A London perspective, GLA).

6.1.2 Policies

Chapter 3 contains policies intended to support the deliver of the Mayor's vision and objectives, particularly those of ensuring that London is:

A city that meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life for all Londoners and helps tackle the huge issue of inequality among Londoners, including inequality in health outcomes.

A city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached, which provide all of its residents, workers, visitors and students – whatever their origin, background, age or status – with opportunities to realise and express their potential and a high quality environment for individuals to enjoy, live together and thrive.

A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London's built heritage and

which makes the most of and extends its wealth of open and green spaces and waterways, realising its potential for improving Londoners' health, welfare and development.

The following policies are presented within Chapter 3 of the draft London Plan.

Policies in Chapter 3 (London's People)	
Policy 3.1: Ensuring equal life chances for all	Policy 3.11: Definition of affordable housing
Policy 3.2: Addressing health inequalities	Policy 3.12: Affordable housing targets
Policy 3.3: Increasing housing supply	Policy 3.13: Negotiating affordable housing on individual private residential and mixed use schemes
Policy 3.4: Optimising housing potential	Policy 3.14: Affordable housing thresholds
Policy 3.5: Quality and design of housing developments	Policy 3.15: Existing housing
Policy 3.6: Children and young people's play and informal recreation facilities	Policy 3.16: Coordination of housing development and investment
Policy 3.7: Large residential developments	Policy 3.17: Protecting and enhancement of social infrastructure
Policy 3.8: Housing choice	Policy 3.18: Healthcare facilities
Policy 3.9: Gypsies and travellers (including travelling show people)	Policy 3.19: Education facilities
Policy 3.10: Mixed and balanced communities	Policy 3.20: Sports facilities

The policies seek to achieve the Mayor's objectives and address the sustainability issues for London, particularly those identified above as being especially applicable to London's people. The policies are designed to ensure that London's communities have the opportunities, facilities, social infrastructure and homes they need to support a good and improving quality of life.

This chapter brings together policies to enable the planning system to help deliver equal life chances for all by reducing health inequalities, supporting social infrastructure provision such as health, education and sport facilities, creating genuinely sustainable neighbourhoods and setting out a suite of housing policies to help deliver more homes for Londoners which meet a range of needs and are of high design quality. These issues are central to meeting the challenges of a growing and ever-more diverse population.

6.1.3 Housing Target Options

The Mayor is obliged to keep the London Plan housing targets up to date. The existing London Plan target of 30,500 homes a year was based on the last London Housing Capacity Study (LHCS), which was undertaken in 2004. The 2004 LHCS study was endorsed by the Panel for the Examination in Public into the Early Alterations to the London Plan. In particular the Panel commended the study's rigour while setting capacity targets which were not 'squeezing the last ounce out of sites by adopting the highest possible figure', and its consistency of approach across London combined with close discussion with boroughs.

Planning Policy Statement 3:Housing (PPS3) now requires planning authorities to undertake Strategic Housing Land Availability Assessments (SHLAA), which essentially supersede Housing Capacity Studies and go beyond them by requiring housing sites to be identified as either deliverable now or developable at a specific point in the future, once identified constraints have been overcome. The recent pan-London SHLAA combines aspects of the 2004 LHCS methodology and builds on the experience gained during this study (*The London Strategic Housing Land Availability Assessment and Housing Capacity Study 2009*, GLA 2009 – forthcoming).

The draft replacement London Plan proposes a new strategic housing target for London based on the outcomes of the recent pan-London SHLAA. However, for the purposes of this assessment three options relating to housing growth were considered for assessment purposes. These options are described below:

Housing Option 1: Current Plan Housing Targets – 30,500 homes

- This is the ‘business as usual scenario’ as currently outlined in the adopted 2008 version of the London Plan. This seeks to achieve a residential dwellings completion rate of some 30,500 per year across London.

Housing Option 2: Increased Housing Target – 33,380 homes

- This option proposes a new housing target to achieve a residential completion rate of 33,380 residential dwellings per year across London. This has been derived from the latest SHLAA for London and is also just above the bottom of the supply range identified by the National Housing Planning Advice Unit.

Housing Option 3: Increased Housing Provision – 41,154 homes

- This option outlines a residential completion rate of some 41,154 residential dwelling per year across London for testing purposes only. This has been derived from the latest SHLAA for London but is based upon an assumption of higher densities on specific ‘potential’ large housing sites and higher amounts of small site development across London. This option also sits within the top end of the supply range identified by the National Housing Planning Advice Unit.

Historically, London has experienced a housing shortage, and housing supply has rarely met or gone beyond identified housing need. It is clear that this has also had an impact on the affordability of housing in London. This concern has become particularly acute in light of recent economic conditions and the downturn in the house building industry.

The National Housing Planning Advice Unit (NHPAU) makes clear that the problem of affordability, as they define it, has not been solved by the market downturn. NHPAU suggest the longer it takes for house building to recover, the higher the build rate will need to settle at if affordability is to be stabilised. In light of this the NHPAU has identified a preferred housing supply range for London of between 33,100 and 44,700 units per annum. The top end of the range is considered to take account of the backlog of need, and the lower end of the range is the need arising from demographic trends not addressing the backlog. The NHPAU considers that meeting the top end of

this supply range will stabilise affordability at 2007 levels by 2026. In contrast the GLA's 2008 Strategic Housing Market Assessment (SHMA), which informs both the London Plan and the Mayor's Housing Strategy, identified a need for 32,600 additional homes per years over a 10-year period up until 2017, but does not consider the issue of stabilising affordability.

A high level assessment of the potential significant effects of the housing growth options was carried out using the IIA objectives. The findings are set out below:

Option	Housing Option 1 – Current Plan Housing Target (30,500 homes)	Housing Option 2 – Increased Housing Target (33,380 homes)	Housing Option 3 – Increased Housing Provision (41,154 homes)
1. Regeneration and Land-Use	<p>This option's housing target is likely to support and stimulate regeneration. Indeed, the investment associated with developing housing is anticipated to improve the public realm and can help support local economies, as well as increase the provision of social infrastructure such as health and education facilities.</p> <p>Existing policies within the current London Plan encourage the predominant use of brownfield sites for redevelopment, which is likely to support efficient, and sustainable land use.</p>	<p>This option is likely to support and stimulate regeneration by providing investment in areas of deprivation and on, and around, brownfield sites as highlighted for Option 1.</p> <p>The increased provision of housing is likely to result in a greater level investment and would be expected to result in more significant regeneration effects. As set out in the <i>Mayor's Housing Strategy</i> (2009), regeneration activity will be more effectively aligned with other social and economic investment initiatives. This is likely to ensure that regeneration benefits and investment in physical improvements offered by the increase in housing are fully optimised.</p>	<p>This option will lead to a significant level of investment that is likely to support regeneration, as highlighted for Options 1 and 2 while potentially helping to address problems of affordability. The increased quantity of dwellings is likely to result in a greater magnitude of regeneration and investment above that of Option 2. However, it may increase the pressure on land and supporting social infrastructure due to the significant increase in households.</p>
2. Biodiversity	<p>This option has the potential to affect biodiversity on brownfield sites (for example due to the removal of derelict buildings that may provide habitat for species e.g. as a roost for bats or nest site for birds). The Mayor's Housing Strategy (2009) recognises the importance of gardens to supporting biodiversity, as well as the benefits that may be gained from green roofs.</p> <p>The existing London Plan contains a number of policies aimed at protecting biodiversity that will minimise any detrimental effects from increasing housing provision, whilst maximising the opportunities for benefits.</p>	<p>This option has the potential to affect biodiversity as described in Option 1. Although, due to the increased target for housing provision, there may be an associated increase in the effect as more sites may be developed.</p> <p>As also noted, existing policies within the current London Plan provide protection to biodiversity, whilst the Mayor's Housing Strategy (2009) recognises the importance of gardens and green roofs to supporting biodiversity.</p>	<p>This option has the potential to affect biodiversity as described in Option 1. Although due to the much higher densities at identified sites, and the potential increase in the number of sites affected than in Option 1, there is likely to be an associated increase in the magnitude of the effect.</p> <p>However, as also noted in Option 1 and 2, existing policies in the current London Plan set out protection for biodiversity.</p>
3. Health and Well-being	<p>The provision of good quality housing is important to supporting and promoting healthy environments in which to live. Policies in the existing London Plan promote a high quality and healthy internal environment by ensuring houses are well insulated to reduce heat loss and therefore keep them adequately heated using minimal energy. The promotion of green roofs and</p>		

Option	Housing Option 1 – Current Plan Housing Target (30,500 homes)	Housing Option 2 – Increased Housing Target (33,380 homes)	Housing Option 3 – Increased Housing Provision (41,154 homes)
	<p>gardens, as well as improved urban realms associated with housing developments is also likely to improve health through improvements in air quality.</p> <p>The number of houses is unlikely to have a significant effect on health, although more temporary short term activity from construction works could contribute to increased dust and noise emissions that may affect health and well-being of those adjacent to developments. However, such issues are likely to be mitigated by measures on a project-by-project basis. Option 3 may place additional pressure on health infrastructure unless it is matched by a proportionate increase in investment.</p>		
4. Equalities	<p>This option is anticipated to support equal opportunities by providing a supply of homes that can be accessed by all. New dwellings are required to adhere to inclusive design standards, which will help ensure that disabled people have the opportunity to live in suitable homes. The provision of new dwellings, particularly social and intermediate dwellings, is likely to help support low income groups to access the property market and is therefore considered beneficial towards equalities.</p>	<p>This option is likely to contribute positively towards the objective for reasons as highlighted in Option 1. However, it is anticipated to have a greater effect due to the increased housing target.</p>	<p>This option scenario is likely to contribute positively towards the objective for reasons as highlighted in Option 1. However, it is anticipated to have a greater effect in comparison with Option 1 and 2 due to the significantly increased provision of housing and the likely consequent effect on affordability.</p>
5. Housing	<p>This option is likely to contribute positively towards the objective by providing Londoners with access to good quality housing (including affordable homes).</p>	<p>This option increases the annual housing target above the existing baseline target. This is likely to positively contribute towards by increasing the supply and availability of good quality housing. It is anticipated that this option will have a greater effect than Option 1 due to the increased housing target.</p>	<p>This option scenario tests the potential of significantly increasing the provision of housing above the baseline target. It is likely to significantly contribute towards the objective by increasing the availability of homes (including affordable homes). It is anticipated that such effects are likely to be greater than those for Options 1 or 2.</p>
6. Employment	<p>The provision of housing is unlikely to have a significant effect on employment opportunities as it focuses on the quantity of residential accommodation rather than its relation to employment opportunities. However, it is recognised that there will be some employment opportunities associated with the construction of dwellings.</p>		
7. Stable Economy	<p>This option is unlikely to significantly affect the economy beyond the current baseline trends.</p>	<p>This option increases the housing target above the baseline. This may contribute to ensuring that employees are able to live closer to their place of work, thereby securing the supply</p>	<p>This option scenario is likely to contribute towards the objective for the reasons highlighted in Option 2, although it is likely to have a greater effect due to the significant</p>

Option	Housing Option 1 – Current Plan Housing Target (30,500 homes)	Housing Option 2 – Increased Housing Target (33,380 homes)	Housing Option 3 – Increased Housing Provision (41,154 homes)
		<p>of labour. Labour supply is a key consideration by businesses in determining location. Therefore this option is likely to contribute positively towards the objective.</p> <p>Additionally, increasing housing supply may improve the affordability of dwellings. This may increase the personal disposable income of people, which is anticipated to support the stability of the economy. Similarly, the investment arising from the development of housing (refer to objective 1) is likely to support the economy. However, in the short term the house building sector may not have the capacity to build this level of new provision.</p>	increase in the provision of housing.
8. Flood Risk and Climate Change Adaptation	<p>The SHLAA excluded unsuitable sites from consideration for housing capacity where there were valid reasons that could not be overcome, such as vulnerability to flooding. Where measures can be implemented to overcome such constraints (such as incorporating set-back from flood defences or not incorporating ground floor properties), appropriate adjustments to the density and the capacity of housing on the site has been made. Therefore no significant effect is likely to occur.</p> <p>The existing London Plan contains a number of policies that support adaptation to climate change (e.g. sustainable drainage systems, green roofs and efficient resource use. It is recommended that such policies be retained in the draft replacement London Plan to support the objective.</p>	<p>As noted in Option 1, the capacity of sites for housing has taken into account flood risks. Therefore, it is not considered to be an issue. In addition, the existing London Plan highlights a number of policies to alleviate the increase in hardstanding from increased housing stock and to adapt to climate change.</p> <p>It is recommended that such policies are retained in the draft replacement London Plan. Therefore, no significant effects are anticipated to occur.</p>	As noted in Option 2, the effects from the provision of a greater number of houses is not anticipated to have a significant effect due to the mitigation measures proposed, and considerations already made with regards to developing the housing figure for this option scenario. However, the higher provisions may increase pressure to build on the flood plain.
9. Climate Change	New dwellings are required to be more energy efficient as a	As noted in Option 1, a number of policies are set out in the	As noted in Option 1, a number of policies are set out in the

Option	Housing Option 1 – Current Plan Housing Target (30,500 homes)	Housing Option 2 – Increased Housing Target (33,380 homes)	Housing Option 3 – Increased Housing Provision (41,154 homes)
Mitigation and Energy	<p>result of policies in the existing London Plan that encourage green roofs, improved insulation and lower energy consumption fixtures. Existing policies also promote renewable energy. This is likely to contribute to providing energy for new housing developments whilst minimising CO₂ emissions per household.</p> <p>However, the increase in housing may result in an aggregate increase in CO₂ emissions for London due to the increase in the number of households from a growing population.</p>	<p>existing London Plan that require energy efficiency measures in new dwellings, which will help reduce CO₂ emissions per household.</p> <p>However, the increase in the housing target may lead to an aggregate increase in CO₂ emissions for London above that in Option 1.</p>	<p>existing London Plan that require energy efficiency measures in new dwellings, which will help reduce CO₂ emissions per household.</p> <p>However, the increase in the provision of housing may lead to an aggregate increase in energy use and CO₂ emissions for London above that in Options 1 and 2.</p>
10. Water Quality and Water Resources	<p>Policies in the existing London Plan will result in reduced water consumption within dwellings through demand management measures (e.g. water efficient and low flow fixtures such as toilets, showers, taps etc. and metering).</p> <p>Wider water quality is unlikely to be significantly affected by the provision of housing as sustainable drainage systems will be incorporated to reduce surface run-off directly into the Blue Ribbon Network, whilst sewage treatment and grey water treatment facilities are planned to provide capacity for the increase in households.</p>	<p>As noted in Option 1, existing policies in the London Plan will reduce water consumption. However, there may be an increase in the aggregate demand above baseline levels due to the increase in the number of homes and households.</p> <p>As noted in Option 1, water quality is unlikely to be affected.</p>	<p>As noted in Option 1, existing policies in the London Plan will reduce water consumption. However, there may be an increase in the aggregate demand above baseline levels due to the increase in the number of homes and households.</p> <p>As noted in Option 1, water quality is unlikely to be affected.</p>
11. Waste	<p>This option is unlikely to affect baseline trends, although there may be an increase in aggregate waste produced due to the increase in households.</p> <p>It is uncertain how recycling rates may change, although policies in the existing London Plan seek to ensure that recycling rates are increased.</p>	<p>This option is likely to increase aggregate waste produced due to the increase in households.</p> <p>The management of such waste is currently uncertain although policies in the existing London Plan promote recycling. Such policies should be retained in the draft replacement London Plan.</p>	<p>This option is likely to increase aggregate waste produced above that in Option 2, due to the relatively significant increase in households.</p> <p>The management of such waste is currently uncertain although policies in the existing London Plan promote recycling. Such policies should be retained in the draft</p>

Option	Housing Option 1 – Current Plan Housing Target (30,500 homes)	Housing Option 2 – Increased Housing Target (33,380 homes)	Housing Option 3 – Increased Housing Provision (41,154 homes)
			replacement London Plan.
12. Accessibility and Mobility	These options are unlikely to have a significant effect on transport infrastructure as it is anticipated that adequate capacity will be provided to meet the demand of a growing population. Indeed, the Mayor's Housing Strategy (2009) states that housing should be implemented with other economic and social investment initiatives.		
13. Built and Historic Environment	These options could place increased pressure on townscapes and the historic environment. Option 3 is likely to have the greatest potential to negatively affect the built and historic environment due to the high densities and the intense use of available land capacity.		
14. Liveability and Place	These options may contribute to liveability and sense of place through increased investment and regeneration (see objective 1). However, Option 3 may result in developments of a very high density which could undermine the sense of place by affecting local character.		
15. Open Space	This option is unlikely to have a significant effect on open space as policies in the existing London Plan set out protection for open space. Consequently, it is recommended that such policies be retained in the draft replacement London Plan to continue to protect open space.	The London Housing Capacity Assessment (2009) considered designated sites and recommended that if open space was de designated to enable housing, replacement open space would be provided. Consequently, no significant effect is anticipated.	The increased provision of housing above that in Option 2 is predominantly based on higher densities at the sites identified in the London Housing Capacity Assessment (2009). Therefore, there is unlikely to be an increased affect on open space than that highlighted in Option 2.
16. Air Quality	This option is unlikely to significantly effect air quality, as policies exist in the London Plan to reduce pollutant emissions.	There may be some effects as noted in Option 1. However, it is not considered that these will be significant as the policies exist in the current London Plan to minimise emissions. .	There may be some effects as noted in Option 1, although they are likely to be proportionally larger than the other two options.
Summary	It is anticipated that this option is likely to positively contribute towards a number of objectives such as regeneration, equalities and, in particular, housing. It is unlikely to have a significant effect against a number of objectives (e.g. air quality, accessibility and mobility,	This option is likely to have the same benefits as Option 1, although they are anticipated to be enhanced due to the increase housing target and therefore the associated benefits (e.g. enhanced availability of housing, investment supporting regeneration etc.). It is also anticipated that the	This option is likely to have the same benefits as Option 1, although they are likely to be enhanced over those in Option 2 due to the benefits associated with increased housing provision (e.g. more investment for regeneration, availability of housing etc.). It may also help support the economy.

Option	Housing Option 1 – Current Plan Housing Target (30,500 homes)	Housing Option 2 – Increased Housing Target (33,380 homes)	Housing Option 3 – Increased Housing Provision (41,154 homes)
	economy or employment).	<p>increase in housing may help the economy by supporting the provision of labour supply close to employment opportunities and providing an increased market.</p> <p>Increased provision may result in a rise in aggregate consumption of resources or production of waste or emissions above that of Option 1 due to the increase in households.</p>	<p>The higher densities required to enable the provision of housing for this option may undermine a sense of place by affecting the context of the built and historic environment.</p> <p>The greater number of households may also result in the increased aggregate consumption of resources, or production of waste or emissions than in Option 2.</p>

Conclusion

The assessment of the housing growth options highlights that Option 2 is likely to be most sustainable as it provides the enhanced benefits arising from additional housing beyond that of Option 1, without the exacerbated effects (such as increased land pressure, and potentially aggregate waste generation, emissions and water consumption) associated with the greater provision of housing and higher densities associated with Option 3. A number of policies within the existing London Plan also mitigate potential adverse effects of housing development and it is recommended that such policies be retained in the replacement London Plan to ensure that a higher housing target does not result in detrimental effects for London.

The increased housing target of 33,380 was derived from the latest London SHLAA and was subject to specific sustainability considerations during this process (please see the SHLAA report for further information³). This increased housing target was the preferred housing option that was taken forward in Chapter 3 of the draft replacement London Plan.

6.2 Summary of the effects of Chapter 3 (London's People)

This chapter seeks to provide for an increased supply of housing, including the availability of a range of housing sizes (to accommodate single person households through to families), and is anticipated to contribute positively towards meeting London's housing needs. Along with the protection and enhancement of social infrastructure, it is likely to support regeneration, particularly in areas of deprivation, and is expected to lead to an improvement in the physical environment. A reduction in overcrowding and increase in the mix of housing types, through the provision of affordable housing, particularly affordable family housing, is anticipated to contribute towards mixed and balanced communities. This is further supported by the policies that ensure adequate provision of health, education and sports facilities.

However, any increase in population will put pressure on social infrastructure that will need to be provided proportionately to the anticipated growth. Should the protection and provision of social infrastructure be delayed or not meet the demand, it could put at risk the achievement of many IIA objectives. It is recognised that a number of policies require, where necessary, the opening of replacement facilities prior to the closure of existing facilities. They also promote the expansion of the provision of social infrastructure facilities. In particular, it is noted that Policy 3.16 sets out the importance and need to coordinate development with investment to ensure such an issue is avoided so far as possible.

It is acknowledged that in combination with policies within the chapter and elsewhere in the Plan, any potential strategic detrimental effects have been mitigated so far as possible and as such, no significant detrimental effects

³ The London Strategic Housing Land Availability Assessment 2009. GLA, 2009 – forthcoming.

are anticipated to occur. In summary, the chapter is broadly going to have a positive or neutral effect against the objectives, although significant positive effects are anticipated to occur particularly against the housing objective.

6.3 Assessment of Chapter 3 (London's People)

1. Regeneration & Land-Use: To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities.

The policies within the chapter support the provision of housing and other elements of social infrastructure to help meet the needs of London's people and address the sustainability issues for London.

It is proposed that there will be an increase in the housing target compared to the current existing London Plan target of 30,500. In addition, relevant policies (in particular Policy 3.17 - protection and enhancement of social infrastructure) acknowledge the need for additional and enhanced social infrastructure to meet the needs of London's growing and diverse population. In combination with other policies within the chapter, there is anticipated to be a positive effect on regeneration. The promotion of mixed and balanced communities (Policy 3.10) and the provision of affordable housing (e.g. Policy 3.12, Policy 3.14) are anticipated to stimulate urban renaissance, optimise land use and lead towards the regeneration of deprived areas. In particular, development supported by the implementation of the policies within this chapter is likely to ensure a diverse mix of tenures is provided along with associated health, education and sports and recreation facilities. Investment in such social infrastructure and housing, especially in mono-tenure estates is also likely to lead the regeneration of some of the most deprived parts of London. The promotion of mixed and balanced communities (Policy 3.10) is also likely to avoid a return to post-war mono-tenure estates which have often become concentrated areas of deprivation (*The London Housing Strategy – Draft for Public Consultation*, GLA, London (2009)).

KEY EFFECTS:

The policies set out will result in an increase in housing supply compared with existing baseline targets. Relevant policies also recognise the need for enhancements to social infrastructure to manage the demand expected from the increase in the population to 2031.

It is anticipated that there will be a positive effect on regeneration and land use as increases in the housing supply is likely to result in the efficient use of available land. Similarly, the investment in mono-tenure estates to diversify the range of tenures will help create mixed and balanced communities in some of the most deprived areas of the region.

2. Biodiversity: To protect, enhance and promote the natural biodiversity of London.

The policies in this chapter have been examined against the objective but no significant effects were identified.

3. Health and Well-being: To maximise the health and well-being of the population and reduce inequalities in health.

A detailed Health Impact Assessment was carried out for this chapter (refer to **Appendix B** for details). It recognises that there are a number of key policies that are likely to help encourage improvements in health by increasing the opportunities for individuals and the supporting social infrastructure. Policy 3.1 (ensuring equal life chances for all) recognises the need for the adequate provision of social infrastructure and expanding opportunities for all is key to tackling inequality across London. This is further supported by Policy 3.2 (Addressing health inequalities), which sets out how the Mayor will work with the NHS, the London Health Commission and the London boroughs to reduce inequalities in health. This will include investing in physical improvements to deprived areas of London and considering the impacts of major planning applications through the use of Health Impact Assessments (HIA), which is likely to help improve health, particularly amongst BAME who can be affected by inequalities due to overcrowding (Mayor of London (2009) *London Housing Strategy – Draft for Public Consultation*, GLA, London).

Furthermore, consideration of health is supported by Policy 3.17 (Protection and enhancement of social infrastructure) and Policy 3.18 (Healthcare facilities). By ensuring that healthcare facilities are supported and adequate provision is made, for example through the requirement for replacement facilities to be made available before the closure of existing facilities, the chapter will not have an adverse effect on the existing baseline. It is anticipated that improvements in health will continue to be made as a result of improving facilities and housing stock.

Policies on housing design and supply call for the highest environmental standards, of which Policy 3.5 (Quality and design of housing developments) specifically refers to internal environments. Ensuring appropriate sized accommodation, rather than a one-size-fits-all approach, particularly for social rented housing is likely to contribute positively to improvements in health by reducing overcrowding (*London Housing Strategy – Draft for Public Consultation*, GLA, London (2009)).

KEY EFFECTS:

The policies in the chapter seek to improve the physical environment including quality and range of housing. This will help reduce overcrowding, traditionally occurring amongst deprived communities and can help improve health inequalities across London, as highlighted by the range in life expectancy.

The protection and provision of social and, in particular, health infrastructure is likely to have a positive effect on health. Additionally, the collaborative approach with the NHS and the London Health commission is anticipated to ensure health services are focussed in areas that will benefit most, thereby reducing inequalities.

Further details of the effect on health are contained in the Health Impact Assessment in **Appendix B**.

4. Equalities: To ensure equitable outcomes for all communities, particularly those most at risk to experience discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London.

A detailed Equalities Impact Assessment was carried out for the chapter (refer to **Appendix C** for more information). It acknowledges that a number of policies within the chapter seek to expand and improve opportunities for all Londoners and that the provision of social infrastructure is an important part towards tackling inequality across London. Policy 3.1 recognises that development proposals should protect and enhance facilities that meet the needs of particular groups and communities. Addressing health inequalities, as highlighted in Objective 3 above, is also a key element of the chapter. By working collaboratively with health organisations, the provision of facilities and services are likely to be focussed in areas of disadvantage, particularly east London. Furthermore, it is recognised that there is likely to be an increase in the provision of education facilities for all age groups and that developments that enhance education and skills provision will normally be supported (Policy 3.19). As such, opportunities for education at all levels are likely to be enhanced for all Londoners including those in deprived communities.

KEY EFFECTS:

There will be an increase in the provision of housing supply, including the range of housing types above the baseline target. Affordable housing will also help improve the opportunities for living in a suitable home, particularly by those traditionally disadvantaged.

Protection and enhanced provision of social infrastructure is also likely to contribute positively to reducing inequalities.

Further details on the effects of the chapter on equalities are presented in the Equalities Impact Assessment in **Appendix C**.

A focus of many policies is to increase the supply and range of housing, particularly affordable homes. There will be an increase in the annual provision of housing above the existing baseline target set in the current London Plan. An increase in the diversity of housing is also likely to contribute to a reduction in overcrowding, which often occurs in less advantaged communities, particularly BAME communities in inner and east London, and where renting dominates (both socially and privately) housing ownership. As such, there is considered to be a positive effect as greater choice and range of affordable housing types will help increase opportunities for people to access suitable and high quality homes, as well as social infrastructure such as health, education and recreation facilities.

5. Housing: To ensure that all Londoners have access to good quality, well-located, affordable housing.

There is likely to be a significant positive contribution towards the objective as a result of many of the policies set out within this chapter. As noted in the baseline evidence, overcrowding is particularly high amongst social rented housing and has increased in private rented housing (Mayor of London (2008) *Housing in London – The Evidence Base for the London Housing Strategy*, GLA, London). The increase in housing is likely to help alleviate this. Policies seek to increase the range of housing within London so that there is a choice of homes suitable for families and individuals as well as other household configurations. Indeed, as highlighted by Policy

KEY EFFECTS:

Housing supply will be increased above the existing baseline target, which is likely to contribute positively towards meeting the need of people.

Affordable housing and the strategic priority to provide a range of housing types, particularly affordable family homes, are likely to help reduce the levels of overcrowding and are anticipated to have a significant positive effect.

3.8 (Housing choice), provision of affordable family housing should be addressed as a strategic priority.

The annual housing target is proposed to be increased from the current London Plan target, which is likely to contribute positively towards meeting the increasing demand from a growing population sustainably. In addition, it is recognised that Policy 3.12 (Affordable housing targets) requires at least 13,200 more affordable homes per year during the lifetime of the Plan. It also highlights that 60% of this should be social housing and 40% intermediate housing, with a priority is accorded to provision of affordable family housing. This is likely to have a positive effect on addressing the issues highlighted in the baseline and contribute to the objective.

The policies in the chapter require housing developments to be of the highest quality design, taking into account their context, social and land use mix, the provision of communal spaces and the needs of children and older people (notably Policy 3.8). Similarly, the quality of existing housing stock (Policy 3.15) will be maintained and enhanced. Additionally 10% of new housing should be wheelchair accessible or easily adaptable (Policy 3.8). As such, housing provision is likely to result in good quality, adaptable and sustainable homes which will help make them affordable to run and pleasant to live in.

6. Employment: To offer everyone the opportunity for rewarding, well-located and satisfying employment.

The policies in this chapter have been examined against the objective but no significant effects were identified. While there are links between the location of housing and employment and between increased local population and jobs, it is recognised that specific development projects arising from the implementation of the policies, particularly the increase in housing supply (Policy 3.3), may result in a change in employment opportunities at the project level in the construction sector. However, it is noted that such employment opportunities are dependent on the exact details of individual schemes, which are unknown at this stage.

7. Stable Economy: To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.

The policies have been examined against the objective but no significant effects were identified. However, the provision of housing (Policy 3.3) may enable people to live closer to their places of work which could help secure the supply of labour, reducing the time lost to travel, increasing productivity and supporting the economy.

8. Flood Risk and Climate Change Adaptation: To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.

The policies have been tested against the objective but no significant effects were identified. The issues and effects relating to flood risk and the adaptation to climate change are predominantly addressed by policies elsewhere in the draft replacement London Plan, notably in Chapter 5. Such policies will provide mitigation for the policies set out in this chapter. Consequently, it is considered that there is unlikely to be any significant direct effects against this objective.

9. Climate Change Mitigation and Energy: To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.

Baseline evidence highlights that in 2003, London produced approximately 44 million tonnes of CO₂, excluding aviation. Approximately 75% (some 35 million tonnes) was generated by the consumption of electricity and gas. The Mayor's *State of Environment Report for London* (2007) indicated that between 2000 and 2003 there was an increase in energy consumption per capita of 4% to 21.77 GWh. Excluding aviation, some 38% of CO₂ emissions were generated by the domestic sector.

The chapter recognises the importance for people to live in well designed, appropriately sized, and energy efficient homes. Policy 3.2 seeks to coordinate planning and action on the environment, climate change and public health to maximise benefits and engage a wider range of partners in action. This approach is likely to be supported by the implementation of Policy 5.2 (minimising carbon dioxide emissions), which will improve the energy efficiency of homes. Policy 3.5 (Quality and design of housing developments) seeks to ensure that new housing is of the highest quality in relation to its context and the wider environment, and should seek to mitigate climate change.

The policies within the chapter focus predominantly on aspects of the provision of housing, (e.g. densities, choice, affordability) and the provision of supporting social infrastructure. Consequently, it is anticipated that the policies within the chapter will not have a direct effect on mitigating climate change or reducing the reliance on fossil fuels, as such issues are covered more explicitly elsewhere in the London Plan. However, in combination with the policies set out in Chapter 5, this Chapter is likely to have a significant effect towards reducing CO₂ emissions from individual residential dwellings and is therefore anticipated to contribute to mitigating climate change.

Indirectly, the promotion of more housing set out in the chapter (particularly by Policy 3.3), recognising the predicted population increase to 2031, may result in an aggregated increase in CO₂ emissions. However, the policies in the chapter in combination with other policies elsewhere in the London Plan are likely to progressively reduce the CO₂ emissions from residential dwellings during the course of the Plan. This is anticipated to positively contribute to the objective in comparison with the existing trend, which indicates that emissions are declining by 1 to 2% annually.

KEY EFFECTS:

There is expected to be an increase in the aggregate emission of CO₂ as a result of the growing population up to 2031 and the increase in the supply of housing.

However, in combination with policies elsewhere in the London Plan (notably in chapter 5) that require the progressive reduction of CO₂ emissions from residential dwellings and non residential buildings is likely to result in a positive contribution in comparison with the existing trend.

10. Water Quality & Water Resources: To protect and enhance London's waterbodies and the Blue Ribbon Network.

The policies were examined against the objective but no significant effects were identified. Whilst it is recognised that the increase in population, and the number of houses, may have an aggregate increase on the demand for water, such effects are mitigated by policies elsewhere in the draft replacement London Plan, notably Chapter 7. Consequently the policies in this chapter are unlikely to significantly affect this objective.

11. Waste: To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.

The policies were examined against the objective but no significant effects were identified. However, there may be a potential effect from the increase in housing (such as the potential increase in the aggregate volume of waste produced within the region as a whole). Such issues and affects are mitigated by policies within Chapter 5. Consequently, no significant effects are anticipated to occur.

12. Accessibility and Mobility: To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).

The *Annual Monitoring Report 5* (GLA, 2009) highlights that there is a continuing positive trend with regards to public transport. The use of public transport continues to grow faster than the use of the private vehicle, and there has been a decrease in private vehicle use of 9% since 2001. The *Annual Monitoring Report 5* (GLA, 2009) also highlights that the provision of public transport is on target to meet a 50% increase in capacity between 2001 and 2021. The policies within the chapter seek to increase the supply of housing above the existing baseline target of 30,500 dwellings per year. This will result in an increase in demand for public transport. However, Policy 3.7 encourages proposals for large residential developments in areas of public transport accessibility. Similarly, Policy 3.16 seeks to ensure that the implementation of the housing policies is integrated with investment from other relevant agencies arising from the implementation of the Mayor's Housing, Economic Development and Transport Strategies. As such, and in combination with other policies elsewhere in the Plan (particularly in Chapter 6), new developments will be supported by good public transport.

KEY EFFECTS:

Policies within the chapter seek to ensure the implementation of housing is integrated with public transport schemes and has good accessibility (Policies 3.7 and 3.16). The baseline trend is that public transport capacity is increasing and in line with other Policies elsewhere in the Plan (notably Chapter 6), there is anticipated to be adequate provision.

Policy 3.8 calls for 10% of homes to be wheelchair accessible which will help to meet needs of Londoners.

On an individual dwelling basis, it is noted that in particular, Policy 3.8 requires 10% of new housing to be designated wheelchair accessible or easily adaptable for residents who are wheelchair users. This is likely to contribute positively to the objective as the London Plan recognises that there are currently some 30,000 Londoners who have an unmet need for wheelchair accessible housing.

13. Built and Historic Environment: To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces and appropriately designed.

The policies were examined against the objective but no significant effects were identified. It is recognised that the increase in housing may result in some changes to the built environment (and the setting of historic assets). However, these are anticipated to be mitigated by the policies in Chapter 7. Consequently, no significant effects are anticipated this objective.

14. Liveability and Place: To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.

It is recognised that it is important for sustainable communities that long term social cohesions is developed in line with sustainable lifestyles, focusing on mixed use environments that provide a sense of place and that are safe and secure.

Policy 3.5 requires that any new developments are of the highest quality with regard to their local context and the wider environment, with particular emphasis on local character. It is recognised that the policy states that new developments should be designed to enhance the quality of local places tacking into account social and land use mix, and the relationships with public, communal and open spaces. Policy 3.6 requires that children and young people have access to secure and well-designed play and informal recreation facilities. Policy 3.8 encourages new developments to offer a range of housing choices in terms of the mix of housing sizes and types, including the Mayor's strategic priority for affordable housing. These issues are likely to have a positive effect towards building sustainable mixed use communities that have a distinguishable sense of place.

KEY EFFECTS:

The provision of a range of housing types (Policy 3.8) and the promotion of a range of social infrastructure will help ensure communities have a variety of facilities to support mixed use environments and social cohesion. The design of new developments must also take into account local contexts and character so sense of place may be preserved and enhanced. Consequently, the policies are expected to contribute positively to liveability and place, especially in combination with other policies within the Plan.

Ensuring that sufficient social infrastructure including education facilities, at all levels, are provided along with sports and health facilities is also likely to positively contribute to a sustainable community. Policy 3.1 aims to ensure equal life chances for all. It sets out that the provision of community facilities for specific groups may be appropriate, which is likely to be beneficial in supporting a local area's character.

Policy 3.7 is also likely to contribute positively to liveability and sense of place by ensuring that large residential developments coordinate the provision of social, environmental and other infrastructure to create neighbourhoods with a distinctive character.

Policies addressing issues of safety and security covered predominantly in chapter 7 (notably Policy 7.3). Therefore, this chapter is not anticipated to significantly affect safety or security, although the promotion of integrated communities and the extension of opportunities for all, especially those who are disadvantaged or socially excluded, may help to reduce the levels of crime.

15. Open Space: To protect and enhance natural open space in London.

The policies were examined against the objective but no significant effects were identified.

However, Policy 3.5 requires that new developments take account of the provision of communal and open spaces. This is anticipated to contribute towards the objective by ensuring adequate access or provision to open space is considered when designing new developments. Additionally, Policy 3.6 is likely to contribute by ensuring children

and young people have access to play and informal recreation facilities that should incorporate trees and greenery wherever possible.

16. Air Quality: To improve London's air quality.

The policies were tested against the objective but no significant effects were identified.

7. Assessment of Chapter 4 (London's Economy)

7.1 Summary of Policies in Chapter 4 (London's Economy)

7.1.1 Summary of Baseline

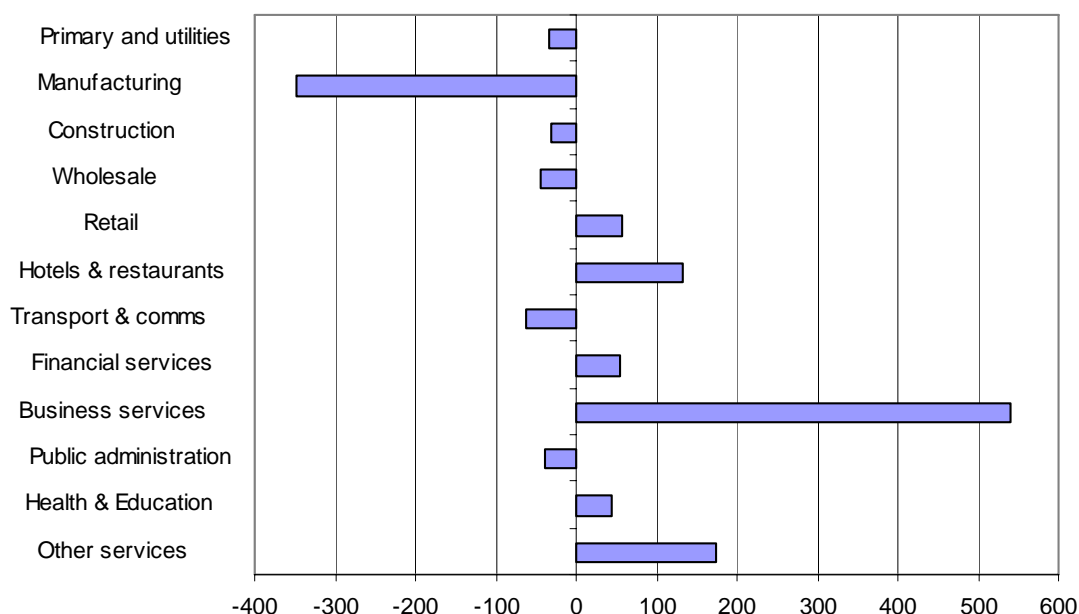
London's economy is currently experiencing a deep recession. It is still too early to say for certain just how deep it is or how long it will last.

The past 35 years have seen huge economic changes as London's once strong manufacturing sector has declined, but has been more than made up for by a growth in services. In 1971, there were more than one million manufacturing jobs in London. A decade later there were 712,000 and by the end of the century, only 326,000. The picture for business services is almost the opposite, with 457,000 jobs in 1971, 498,000 in 1981 and 1.010 million by 1999. Overall, employment in London declined through the 1970s (from 4.6 million in 1971 to 4.2 million in 1977), then experienced two years of growth before declining further during the recession of the late seventies and early eighties to 4.01million in 1983.

From then employment grew during the service sector dominated upturn of the late 1980s reaching 4.3 million in 1989 before the onset of London's first post industrial down-turn, which ushered in a period of substantial if uneven service driven growth (400,000 additional jobs) to 2007. The downturn of the early nineties was significant with a loss of 490,000 jobs (about 11 per cent of the total) by 1993, reflecting a decrease in output of about five percent.

Growth resumed in 1993, and by 1999, total employment had reached 4.4 million. London's output expanded by nearly 40 per cent between 1993 and 2001, while civilian workforce jobs increased by around 16 per cent over the same period. There was a further downturn in 2002 following the collapse of the dot com boom and the 9/11 terrorist attacks in the United States; output rebounded and increased by almost 20 per cent between 2003-7, while employment increased by nearly 5 per cent. By 2007, London's total employment was 4.7 million. Recent changes in the composition of London's employment sectors are highlighted in **Figure 7.1**.

Figure 7.1 Change in London's employment 1984 - 2005



London is seen as a pre-eminent global business location. The 2008 European Cities Monitor ranked London as Europe's top city business location (a position it has held every year since 1990). This was reinforced by the Global Financial Centres Index (published in 2007 and 2008 by the City Corporation), which ranks London as the world's top financial centre (closely followed by New York), and by the Mastercard Worldwide Centres of Commerce Index published in 2007 and 2008, showing London first, ahead of New York.

Alongside this generally successful picture, London has had higher levels of unemployment, and lower levels of employment than other parts of the country. Employment in London is increasingly skewed towards occupations needing higher-level skills and qualifications given the nature of the sectors in which it specialises, and as rising land values have squeezed other activities out. **Figure 7.2** highlights the key employment sectors (or specialisms) in London and also shows the predominance of office based sectors (mainly finance and business services) within inner London as compared to outer London and the rest of the country measured by job density.

Figure 7.2 Employment in Inner London and Outer London (compared to Great Britain) 2005

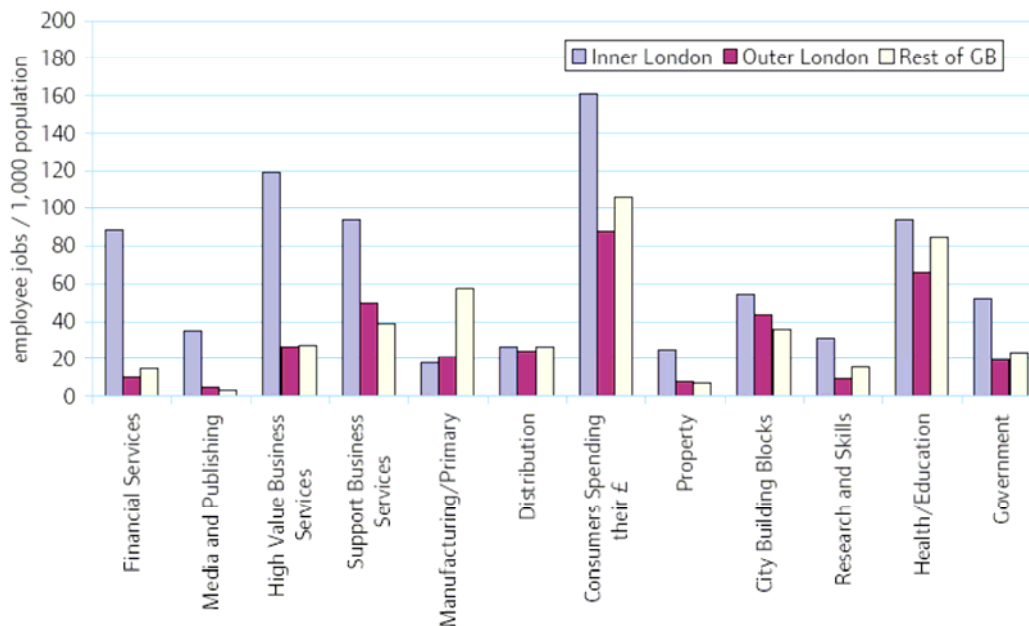
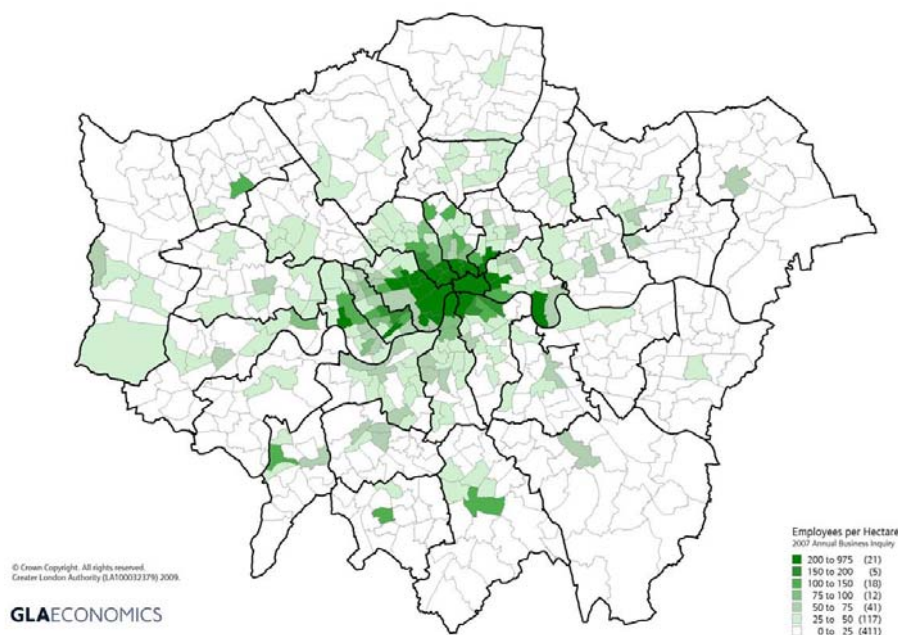


Figure 7.2 also shows that generally employment is fairly similar between outer London and the rest of the country (with the exception of manufacturing where it is lower). In other words, it is the high employment in Inner London that is extraordinary, not the level of employment in outer London which is relatively standard for the UK. **Figure 7.3** also highlights the significance of central London by showing the density of employment by ward.

Figure 7.3 Map Showing Employment Density by ward 2007



As noted above, London is consistently ranked as one of the best cities in the world to do business in. The availability of highly skilled staff is an important factor for attracting businesses to London, along with its proximity to markets (both its domestic market and its openness to international markets). The proximity to high calibre universities and level of cultural activity also makes London an attractive location for businesses.

In the annual European Cities Monitor undertaken by Cushman & Wakefield, executives from 500 top European businesses have consistently ranked London the best European city to do business in over the past four years. London is ranked first in the four factors that businesses consider as most important for determining where to locate in Europe (refer to **Table 7.1**).

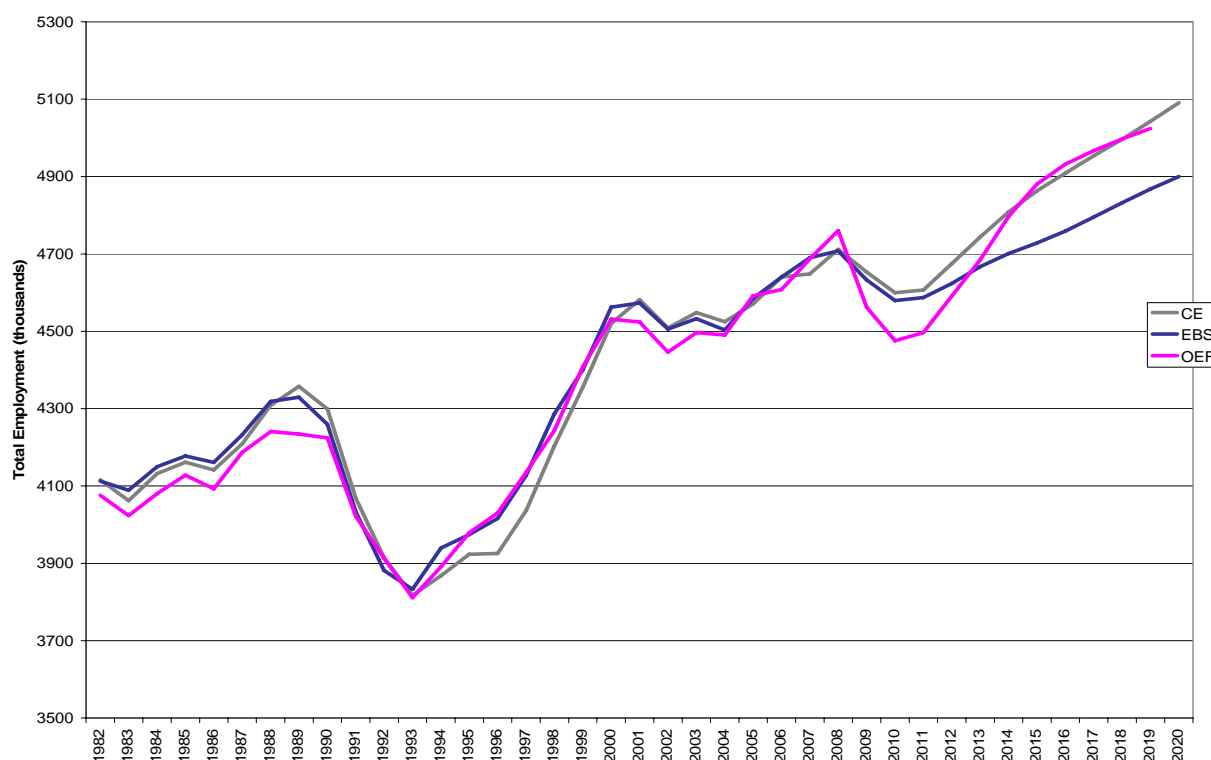
Table 7.1 Attractiveness of London to do business 2005 to 2008 (European Cities Monitor, Cushman and Wakefield)

	2008	2007	2006	2005	2008 Leader
Availability of qualified staff	1	1	1	1	
Easy access to markets	1	1	1	1	
Quality of telecommunications	1	1	1	1	
External transport links	1	1	1	1	
Cost of staff	29	25	16	22	Warsaw
Climate for doing business	5	2	5	6	Dublin
Language spoken	1	1	1	1	
Office space - value for money	24	18	29	24	Leeds
Internal transport	1	1	1	2	
Availability of office space	5	2	1	3	Berlin
Quality of life	14	11	7	13	Barcelona
Freedom from pollution	27	29	26	27	Oslo

Into the future, it does seem likely that globalisation driven by mass production, technological innovation, reducing transport and communication costs and the continuing growth of markets and international trade with other countries will support resumed economic growth. The world economy is likely to be more integrated by 2031 and larger, with China, India and other currently “emerging” markets having greater economic weight and providing wider markets for products and services. Closer to home, a growing London population is likely in itself to support an expanding economy.

GLA Economics, who are informed by three independent forecasters who monitor the London economy, are projecting that London is likely to experience a cyclical recovery following the current recession. Further work is required to reconcile the different projections, however, the independent forecasters show a very similar trend in future employment growth. **Figure 7.4** shows each of these projections out to the year 2020, and for context also shows the trends for past employment growth since 1982.

Figure 7.4 Employment projections to 2020



GLA Economics is currently working on new projections to support the London Plan review. Preliminary projections suggest that the total number of jobs in London could increase from current 4.7 million in 2007 to approximately 4.8 million in 2011, 4.9 million by 2016, 5.0 million by 2021, 5.2 million by 2026 and 5.3 million by 2031. This equates to an addition of approximately 650,000 jobs over this period. It is expected that the growing number of Londoners of employment age (16-74) in the period to 2031 will also support these projections.

Looking at sectors within the economy, the preliminary figures suggest it is likely that manufacturing will continue to decline, from 203,000 jobs in 2007 to 99,000 by 2031, while business and financial services could grow from 1.5 million in 2007 to 2 million in 2031 (representing almost 75 percent of the total employment growth). These trends will have implications for planning policies relating to office provision and industrial land. Other sectors where

growth might be expected are “other services” (including leisure and other personal services) which could show growth of around 307,000 jobs between 2007-2031. There is also expected to be growth in the number of hotel and restaurant jobs (265,000) and retail jobs (80,000) over this period.

The trend is for employment to grow fastest in central and inner areas of London, given the tendency for financial services and those business services strongly related to it to concentrate in central areas, while those sectors showing lower levels of growth or declines tend to be more dispersed. The trend towards a comparatively lower level of employment growth in outer London, despite it being where the majority of Londoners live, suggests that this part of the capital might not be realising its full potential to contribute to London’s success. It is therefore expected that the spatial concentrations of employment shown in **Figure 7.3** will continue into the future.

It is expected that London’s attractiveness to business will continue provided those factors that make it attractive today are maintained and enhanced. It is particularly difficult to estimate the evolution of these conditions and they may decline without the effective implementation of a spatial development strategy to manage growth in London.

Key Baseline:

- Unemployment rates in 2008 averaged 8% across Inner London and 6% in Outer London. London has the highest female unemployment rate of all UK regions (Source: The London Health Inequalities Strategy Draft for public consultation, 2009).
- The mean or average unequivalised household income for London in 2008 was £38,892, this compares to £37,681 for the equivalised figure; the unequivalised average is just over £5,000 higher than the Great Britain average of £34,417 (Source: GLA, PayCheck 2008).
- The two largest sectors in London’s economy were the real estate, renting and business activities (business services) sector and the financial intermediation (financial services) sector which contributed £67.0bn and £37.0bn respectively to London’s GVA in 2004 (Source: Focus on London 2008 - Chapter 4: Economy & Industry).
- London’s economic output grew at an annualised rate of 2.7 per cent in quarter three of 2008 compared to 0.3% in the UK. However London’s Gross Value Added (GVA) growth rate is set to fall to –2.7% in 2009. Growth should remain negative in 2010 before rising to 1.7% in 2011 (Source: GLA, London’s Economic Outlook: Spring 2009).
- Approximately 452 hectares of industrial land have been released from industrial use or designation between 2001 and 2006. This change of land use has been at an average rate of 90 hectares per annum (Source: GLA, London Industrial Land Release Benchmarks, 2007).
- London’s International, Metropolitan, Major and District town centres accommodate over 10,000,000 square metres (Sq m) floorspace (retail, leisure and vacant floorspace), of which approximately 6,300,000 Sq m is in retail use (Source: GLA, London-wide Town Centre Health Checks 2006 Analysis).

7.1.2 Policies

Chapter 4 contains policies primarily intended to support the London Plan’s objectives, particularly that London:

Meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life for all Londoners and helps tackle the huge issue of inequality among Londoners, including inequality in health outcomes; and

Strengthens its position as an internationally competitive and successful city with a strong and diverse economy and an entrepreneurial spirit that benefit all Londoners and all parts of London; a city which is at the leading edge of innovation and research, and which is comfortable with – and making the most of – its rich heritage and cultural resources.

The policies within the chapter will support the development and growth of London's diverse economy over the years to 2031. They will enable it to contribute to the prosperity of the UK and will provide Londoners with the goods, services and job opportunities they need.

The policies set out in London's Economy complement the Mayor's Economic Development Strategy which is being developed alongside the Plan. The Mayor's Economic Development Strategy focuses on the needs of different sectors of the economy and their workspace requirements. It also provides a policy base for emerging economic sectors and a more widely 'connected' economy.

Ensuring that all Londoners are able to share in the region's success is a key priority and the policies within this chapter focus on how the contribution planning policy can make to improving economic and employment opportunities for all Londoners. The following policies relating to London's economy are presented within Chapter 4 of the draft replacement London Plan.

Policies in Chapter 4 (London's Economy)

Policy 4.1: Developing London's economy	Policy 4.7: Retail and town centre development
Policy 4.2: Offices	Policy 4.8: Supporting a successful and diverse retail sector
Policy 4.3: Mixed use development and offices	Policy 4.9: Small shops
Policy 4.4: Managing industrial land and premises	Policy 4.10: New and emerging economic sectors
Policy 4.5: London's visitor infrastructure	Policy 4.11: Encouraging a connected economy
Policy 4.6: Support and enhance the provision of arts, culture and entertainment	Policy 4.12: Improving opportunities for all

7.2 Summary of effects of Chapter 4 (London's Economy)

The policies within the chapter support economic development throughout London. By encouraging the regeneration of town centres, wider distribution of cultural facilities and the diversification of employment opportunities, Londoners, and London's economy, should benefit positively. Economic development and employment will also be positively supported on a sector basis through sector specific policies including tourist accommodation, new and emerging sectors and communications sector.

The removal of barriers, such as accessibility to employment from disadvantaged communities, to the labour market is likely to have significant positive effects for equality, employment and economic development. The

support for small and independent retailers is also likely to have important positive effects and will contribute to equality and employment.

Such measures are likely to help regenerate areas, particularly deprived communities, by providing increased employment opportunities and increasing the level of investment in such areas. This can help enhance the physical appearance of deprived communities promoting an improved sense of place and liveability as well as encourage social cohesion amongst communities across London.

The success of the implementation of these policies will help meet the needs of the predicted growth in population over the lifetime of the London Plan and can also help deliver a wide range of sustainability benefits, by ensuring funding contributions for transport infrastructure improvements, enhancing community development and improving the quality of life for people.

The policies set out in Chapter 4 do not directly address or are not relevant to all the objectives. In many cases policies elsewhere in the draft replacement London Plan mitigate and address such objectives. Therefore, no significant effects are anticipated against biodiversity, housing, flood risk and climate change adaptation, climate change mitigation, water quality and resources, waste, the built and historic environment and open space. Further information is included in **Appendix I**.

7.3 Assessment of Chapter 4 (London's Economy)

1. Regeneration & Land-Use: To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities.

The Government's Index of Multiple Deprivation (**Figure 5.6** the baseline) highlights the concentrations of deprivation within London, located primarily within eastern London as well as central and north London, with a cluster to the West of London (around Park Royal).

Improvements to the physical environment are dealt with in Policies 4.7 and 4.8, which focus on retail and town centre development. In particular Policy 4.8 recommends that local retail strategies should be developed in partnership with communities who can contribute to identifying areas that are under-served. This can promote more equitable patterns of investment focussing investment on services and retail in areas most in need, which will help to alleviate the polarisation of deprivation among London's population highlighted by the baseline. Support for small shops (Policy 4.9) is also likely to be particularly positive at encouraging the increase in businesses in local communities and is likely to help support regeneration.

KEY EFFECTS:

The policies in this chapter promote improvements to the physical environment, and support the regeneration of deprived areas. Diversifying the retail sector, encouraging small shops and promoting town centre development are likely to contribute positively to the objective.

The development of cultural quarters can support regeneration as they promote the image of an area and create a sense of place. They also often create a trigger effect and lead to the wider regeneration of an area. Policy 4.6 will

make provision for arts and cultural provision in outer London (the majority of which facilities are currently concentrated in central London). Where these cultural facilities are located in areas of relative deprivation this can promote regeneration of areas by acting as a focal point to attract more investment. This policy also supports the temporary use of vacant buildings for performance and creative work. Making creative use of the physical realm and giving people a sense of ownership of their local area is important to uplifting local areas. Therefore, the policies within the chapter are likely to contribute positively towards the objective.

2. Biodiversity: To protect, enhance and promote the natural biodiversity of London.

The policies were tested against the objective but no significant effects were identified.

However, it is noted that Policy 4.10 supports the enhancement of biodiversity through its support of a ‘Green Enterprise District’ in Thames Gateway. As part of the design concept this development will include the creation of an eco-region which would integrate bio-diverse green spaces in its development. This will positively contribute towards the objective, particularly on biodiversity in east London.

3. Health and Well-being: To maximise the health and well-being of the population and reduce inequalities and health

A detailed Health Impact Assessment (HIA) was undertaken considering the policies within this chapter (refer to **Appendix B** for more information). The HIA recognised that a lack of access to affordable and nutritious food is a contributor to poor health. Local communities may experience inadequate public transport, a lack of healthy foods at available stores, and poor education can contribute to poor eating habits. The HIA noted that Policy 4.7 promotes retail (which includes supermarkets) development in town centres with a focus on accessibility. Similarly, Policy 4.8 supports street and farmers markets to enhance their offering. Both of these policies can play an important role in improving Londoners’ access to healthy foods and contribute to meeting Londoners’ dietary requirements.

Policy 4.7 promotes pattern of town centre development that supports and promotes walking and cycling which can contribute to healthier lifestyles. Enjoying cultural and leisure activities are also important contributors to health and can help reduce stress and enjoy more well-balanced lifestyles. Policy 4.6 supports provision of arts, cultural and entertainment facilities, which can contribute to general levels of well-being among communities by providing important recreational activities, such as concerts,

KEY EFFECTS:

The provision of a range of employment opportunities throughout London will help ensure people have access to suitable employment, and are likely to remain healthier by having a steady income.

Healthier and more balanced lifestyles can promote greater health and wellbeing. This is supported through the promotion of walking and cycling and provision of arts and leisure facilities in outer London.

Health and well-being is also complimented through the diversification of the retail sector that will promote of access to affordable and nutritious food, particularly through town centre planning that focuses on accessibility.

Further information is available in the Health Impact Assessment in **Appendix B**.

exhibition spaces and other entertainment facilities that can help heighten people's enjoyment of the region and reduce levels of stress and anxiety.

The HIA also recognises that Policy 4.12 will help remove barriers to employment and is likely to be beneficial to health as there is a correlation between unemployment and reduced levels of health.

4. Equalities: To ensure equitable outcomes for all communities, particularly those most at risk to experience discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London.

An Equalities Impact Assessment was undertaken for the policies within this chapter (refer to **Appendix C**). It notes that the potential effects are dependent on the specific location of investment and economic activities and recognises that economic activity is primarily located based on market conditions. However, the promotion of the economy by the policies within the chapter will help to increase the availability of opportunities across London. A more equitable geographic provision of services is promoted in Policy 4.6 which supports a greater distribution of arts and cultural facilities in outer London. This policy notes that there are currently travel and financial barriers experienced by parts of London's population which prevent them from accessing these facilities which tend to be concentrated in central London. Consequently the policy is likely to contribute positively towards the objective.

KEY EFFECTS:

The policies listed in this chapter will address inequalities in London on both a geographic basis as well as on an ethnic and cultural basis. Geographic inequalities will be addressed through provision of arts and cultural facilities and town centre and retail development focussing on under-served areas.

The chapter will positively affect inequalities in the labour market by focusing on removing the barriers which prevent parts of the population from fully and effectively participating in the labour market.

More information is available in the Equalities Impact Assessment contained in **Appendix C**.

The promotion of town centre and retail development (Policy 4.8) recommends that under-served areas in terms of retail and services are supported with facilities in accessible locations. In particular, this policy recommends that local retail strategies should be developed in partnership with communities who can contribute to identifying areas that are under-served. This can promote more equitable patterns of investment that will help reduce inequalities in the provision and access to retail and other services. In addition, the Equalities Impact Assessment (refer to **Appendix C**) highlighted that BAME groups often work in the retail sector and are therefore likely to benefit from the policy. Policy 4.9 supports the provision of affordable shop units for small and independent retailers. As a number of SMEs are operated by BAME, this is likely to help support a reduction in inequality.

It is recognised that Policy 4.12 aims to remove barriers in the labour market that prevent all of London's population from participating and sharing in the wealth of London. This is important given the inequalities that relate to employment by different population groups, particularly among BAME groups. As identified by the 5th *London Plan Annual Monitoring Report* (2009), whilst there has been an improvement in absolute terms there is still a significant gap between BAME groups and the White population. Consequently, it is considered that the policies within the chapter are likely to positively contribute towards the objective.

5. Housing: To ensure that all Londoners have access to good quality, well-located, affordable housing.

The policies were examined against the objective but no significant effects were identified.

6. Employment: To offer everyone the opportunity for rewarding, well-located and satisfying employment.

Despite London being one of the top business centres in the world it still experiences relatively high levels of unemployment, and low levels of employment, in comparison to the rest of England, particularly among lower qualified people (GLA Economics (2009) *Working Paper 36 Commuting Patterns in London by Qualification Level and Employment Location*, GLA, London). This is due to factors such as employment opportunities being skewed towards higher skilled occupations.

Policy 4.12 is likely to help remove barriers to employment opportunities for London by overcoming specific labour market barriers (such as the high costs of childcare), which currently exclude certain segments of the population from participating. The policy will also invest in developing a higher skilled workforce, to match the available skills of the labour market with the demand profile of jobs in the Capital. Policies elsewhere within the London Plan (notably in Chapter 2) promote outer London, which in combination with the policies within this chapter are likely to help diversify the economy and promote employment opportunities across London.

KEY EFFECTS:

This chapter is anticipated to positively affect employment by addressing barriers to employment experienced by sections of London's population including ethnic minorities as well as single mothers.

It will also have significant positive employment effects in a range of sectors through its specific sector support including, tourist accommodation, retail, new and emerging sectors and communications.

This chapter includes sector specific support policies which will have benefits in terms of employment associated with those industries. For example Policy 4.5 supports new visitor accommodation, Policy 4.6 supports the arts and cultural sector, Policies 4.7 and 4.8 support retail provision, and Policy 4.10 supports new and emerging sectors.

Policy 4.11 focuses on encouraging a connected economy, particularly through the delivery of information and communications technology. This can support the wider objectives of facilitating flexible working, such as home working, which can increase the availability of employment opportunities to all. By increasing the potential for people to make choices about how and where they work, this policy can support the objective of creating satisfying employment.

Policy 4.9 supports the provision of affordable shop units for small and independent retailers. This can support an important source of self employment and SME employment. This will help provide a range of employment opportunities with London from larger corporate opportunities to SME industries.

This chapter is considered to positively contribute significantly towards the objective by encouraging economic diversity to provide equitable and satisfying job opportunities to Londoners.

7. Stable Economy: To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.

There are a number of supply side policies that aim at making provision for London's continued growth. Policies 4.1, 4.2 and 4.4 encourage the development of a suitable range of workspaces (both office and industrial). Policy 4.1 in particular supports those areas that are fundamental in maintaining London's profile in the business world, such as the Central Activity Zone where a significant number of service based businesses choose to locate. This policy also acknowledges the strategic importance of providing affordable office space in outer London to compete with the Outer Metropolitan Area, rather than inner London (Outer London Commission (2009) *The Mayor's Outer London Commission: Interim Conclusions*, OLC, London). This is particularly important given that value for money office space is one of the areas of the 2008 European Cities Monitor by Cushman and Wakefield (refer to table 4.1 in the baseline section) in which London does not feature as a leader. The policies in the chapter also support the importance of London maintaining its role as a world-class business centre by promoting London to international and European agencies.

KEY EFFECTS:

The policies listed in this chapter will provide a range of support mechanisms to promote a diverse and stable economy. Policies aim at providing varied range of workspaces in terms of type and location to facilitate the continued expansion of the economy.

Policies also offer sectoral support, focussing on new and emergent sectors, critical for London to maintain its place as a top place to do business. London's low carbon economy can be stimulated through the Green Enterprise District.

Policy 4.4 promotes the development of a diverse economy. It acknowledges that despite London's strong service based economy it is still necessary to make provision for industrial land and premises to facilitate sectors such as manufacturing, maintenance, waste management and recycling, and wholesale and logistics. London's diverse economy is also promoted by Policy 4.10, which supports new and emerging economic sectors with a focus on innovation and research. This support is crucial to London maintaining its leadership position and remaining on the cutting edge of new technologies which contribute to its attractiveness as a place to do business and will positively contribute towards the objective. Policy 4.10 also supports the development of the Green Enterprise District in the Thames Gateway. This will support research and development into green technologies and businesses that will support a low-carbon economy and promote London's position as a world leader in the green economy.

Economic development will also be facilitated by the improved efficiency of the labour market as promoted in Policy 4.12.

Overall, therefore, the policies in this chapter are expected to significantly contribute towards the objective.

8. Flood Risk and Climate Change Adaptation: To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.

The policies were examined against the objective but no significant effects were identified.

9. Climate Change Mitigation and Energy: To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.

The policies were examined against the objective but no significant effects were identified.

However, it is noted that Policy 4.1 supports a shift towards a low carbon economy and Policy 4.10 supports the Green Enterprise District, which may lead to economic activities associated with developing mitigation measures (such as research and development). This may contribute positively towards the objective.

10. Water Quality & Water Resources: To protect and enhance London's waterbodies and the Blue Ribbon Network.

The policies have been examined against the objective but no significant effects were identified.

11. Waste: To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.

The policies have been examined against the objective but no significant effects were identified.

12. Accessibility and Mobility: To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).

Ensuring adequate accessibility and mobility is important to enabling all Londoners participate in the opportunities that London has to offer. Policy 4.6 will promote the development of cultural and arts facilities in outer London locations with good transport links which will improve accessibility to those communities unable to access or discouraged from accessing the facilities that are predominantly located in central London. Policies 4.7 and 4.8 contribute to the development of town centres that support the provision of facilities in locations accessible by walking, cycling and public transport.

KEY EFFECTS:

The policies seek to promote economic activity across London. The regeneration of town centres and the provision of cultural facilities will help reduce people's need to travel and will make the accessibility of economic opportunities easier. Consequently, the policies are likely to contribute positively towards the objective.

By encouraging the economic regeneration of town centres in outer London, as well as the provision of employment opportunities and entertainment facilities across London, it will reduce people's need to travel and increase the accessibility of services and employment opportunities. Consequently, it is anticipated to contribute positively towards the objective.

13. Built and Historic Environment: To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces and appropriately designed.

The policies were examined against the objective but no significant effects were identified.

14. Liveability and Place: To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.

The physical environments that people live in have important effects on social cohesion, well-being and health, as well as creating a sense of identity that underpin communities. Policies 4.1, 4.2 and 4.3 encourage the development of mixed use development as well as development in outer London. Locating employment opportunities closer to residential areas, particularly deprived communities will contribute to developing sustainable communities and reduce the need and distances travelled to access employment opportunities. This objective is also supported by Policy 4.4 which plans for the release of surplus industrial land so that it can contribute to housing, social infrastructure and town centre renewal – consistent with making an area more liveable for its population.

KEY EFFECTS:

Policies support the development of sustainable communities by stimulating employment opportunities in outer London and developing mixed use developments.

The development of arts and cultural facilities as well as support for smaller retail units can contribute to creating a sense of place in a community and are anticipated to contribute positively towards the objective.

Policy 4.6 promotes the creation of arts and cultural facilities across London, particularly in outer London. This supports the creation of local community identity and acts as a focal point that can generate social cohesion. Policy 4.8 supports street and farmers' markets, which also contributes to a sense of place and promotes social cohesion and sustainable lifestyles by supporting local and specialist producers. Both of these policies can contribute to a sense of community and give a local area a sense of place and vibrancy and develop its character.

Policy 4.9 supports provision for affordable shop units for small and independent retailers. This will support a more varied retail offer for smaller and speciality stores which can contribute to giving an area a sense of place and avoid the tendency for homogenous retail choice. Overall these policies are expected to have a significant positive effect on liveability and place.

15. Open Space: To protect and enhance natural open space in London.

The policies were examined against the objective but no significant effects were identified.

16. Air Quality: To improve London's air quality.

Whilst there have been improvements in air quality, the levels of pollutants breach EU and national targets (Mayor of London (2007) *Greener London – The Mayor's State of the Environment Report for London*, GLA, London). The policies in the chapter promote a greater geographical distribution of economic opportunities that will help reduce the need for Londoners to travel by promoting local economies in town centres, particularly in outer London. This approach supports the Outer London Commission's recommendation for a 'star and cluster' approach to spatial development rather than the traditional 'centre and spoke' form of linear development (Outer London Commission (2009) *The Mayor's Outer London Commission: Interim Conclusions*, OLC, London). This may help reduce congestion and reduce pollution emissions. Similarly, Policy 4.5 promotes walking and cycling for visitors to the capital, whilst Policies 4.7 and 4.8 encourage retail and town centre development that promotes sustainable forms of transport and, again, reduces the need for Londoners to travel. The use of more sustainable forms of transport will have an associated reduction in emissions that will positively contribute to local air quality.

KEY EFFECTS:

The chapter promotes the wider distribution of economic activity throughout London. In particular, by promoting local economies in town centres in outer London it supports a 'star and cluster' development approach that will help reduce the need for people to travel. This will help reduce congestion and is anticipated to contribute towards improving air quality.

8. Assessment of Chapter 5 (London's Response to Climate Change)

8.1 Summary of Policies in Chapter 5 (London's Response to Climate Change)

8.1.1 Baseline Summary

The Earth's climate is changing as a direct result of anthropogenic greenhouse gas emissions. Action to mitigate climate change relates to the reduction of greenhouse gas emissions. The principal greenhouse gas that contributes to climate change is carbon dioxide (CO₂) of which London produces approximately 44 million tonnes of emissions per year (excluding aviation). **Table 8.1** below outlines the different contributions to London's CO₂ emissions over the surveyed years of 1990, 1991 and 2003, and the change from 1990 to 2003.

Table 8.1 London's CO₂ Emissions 1990, 1991 and 2003

	1990*	1991*	2003*	% Change
Domestic	15,817	16,949	16,445	+4%
Commercial / Industrial	19,715	19,932	17,679	-10%
Transport	12,585	12,280	9,541	-24%
Total	48,117	49,160	43,665	-9%
Tonnes/resident	7.08	7.2	5.91	-17%

* Figures in 000s tones

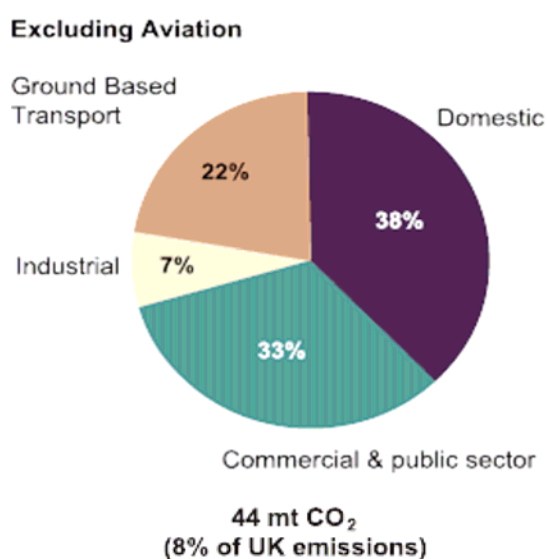
(Source: National Atmospheric Emissions Inventory)

More recent data on CO₂ emissions has been collected as part of the London Energy and Greenhouse Gas Inventory (LEGGI) for 2004 and 2005, however this has been calculated differently and is not directly comparable to the data above. Further work is to be undertaken to reconcile these two data sets.

Overall it appears that London's CO₂ emissions are declining from the 1990 base year and preliminary information from the LEGGI show that London is currently reducing emissions by approximately 1 to 2 percent annually. This represents a change from the trend in the late 80s and early 90s where annual increases were about 1 to 2 percent. This highlights the impacts of policies to positively reduce CO₂ emissions in London and in the UK. However, it is forecast that if no further action is taken London will increase its emissions by 15 percent to 54.7 million tonnes by 2025. Further information regarding CO₂ emissions can be found in the Mayor's Climate Change Action Plan, and will be updated in the Mayor's forthcoming Climate Change Mitigation and Energy Strategy.

The most recent CO₂ emission estimate for London is 47.5 million tonnes (GLA (forthcoming) *Draft Climate Change Mitigation and Energy Strategy*). This is an increase from the total for London in 2003 that recorded 44 million tonnes (rounded), representing eight per cent of total UK emissions (Mayor of London (2007) *Greener London – The Mayor’s State of the Environment Report for London*, GLA, London). **Figure 8.1** illustrates that in 2003, the emission of CO₂ was largely from the consumption of energy in the domestic, commercial, industrial and ground transport sectors. Of this, London’s consumption of electricity and gas contributed to the emission of 35 million tonnes of CO₂ per annum, which accounted for 75 percent of London’s emissions in 2003.

Figure 8.1 Carbon Dioxide Emissions in London by Source (2003)

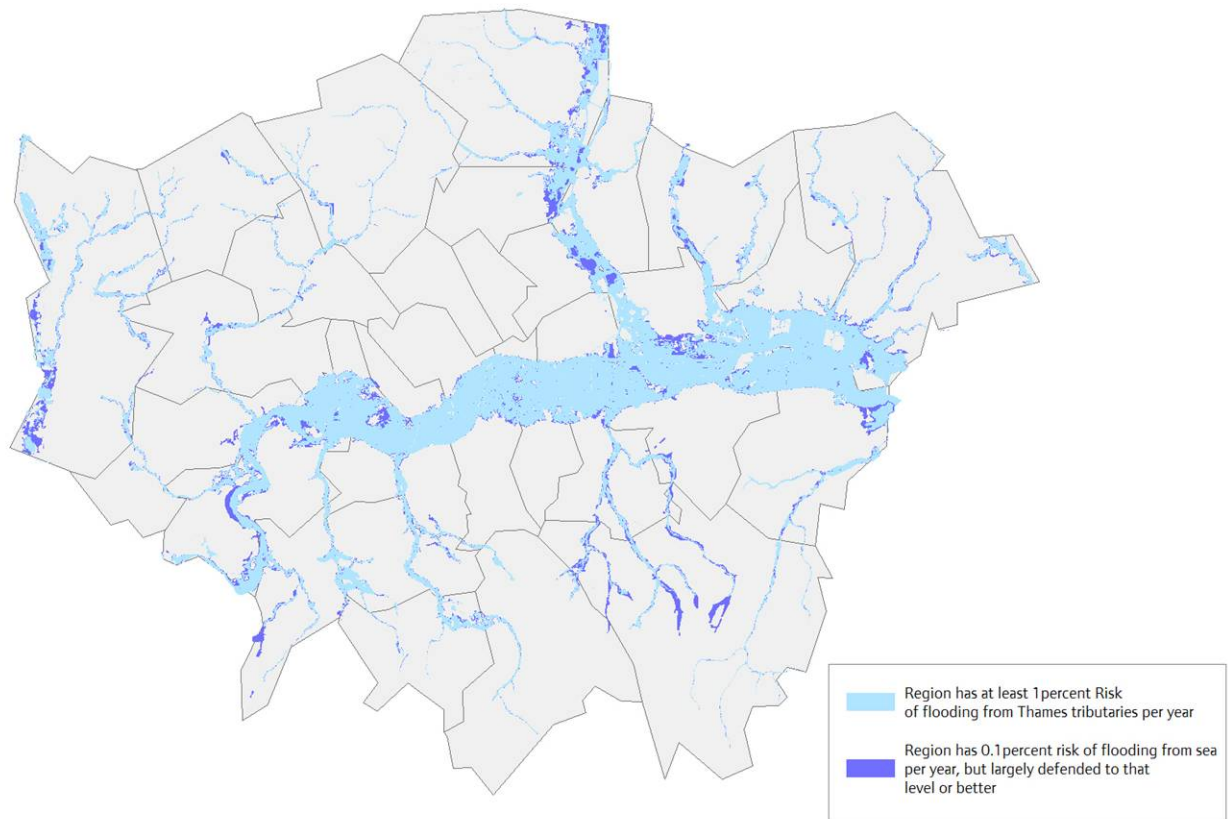


Climate change will have a considerable impact on London and the key effects are expected to relate to the impact of flooding, overheating and drought. The effects of the 2003 summer heat wave and the 2007 summer floods are consistent with the impacts that are expected to occur more frequently as climate changes (although no single event can be attributed to climate change). These events have highlighted how vulnerable London is to weather extremes. A recent study has ranked London ninth among major cities across the globe in terms of vulnerability to natural hazards. New York and Tokyo are ranked higher, but all of London’s major risks (storms, flooding and tidal surge) are weather-related and are predicted to worsen as climate changes.

London is prone to flooding from five possible sources: the sea; the Thames and its tributaries; heavy rainfall causing surface pooling and flooding; the sewers being overwhelmed as a result of heavy rainfall; and rising groundwater. Nearly 15 percent of London lies within identified flood risk zones and is protected by an integrated system of floodwalls, barriers and gates. This represents nearly 1.25 million people and 480,000 properties.

Figure 8.2 below shows the areas of London most at risk of flooding if there were no defences. This map highlights how well London is protected from tidal flooding thanks to the Thames Barrier, which offers some of the highest standards of protection in the world. The standards of protection against other forms of flooding (for example non-tidal Thames and tributaries) are much lower and vary considerably.

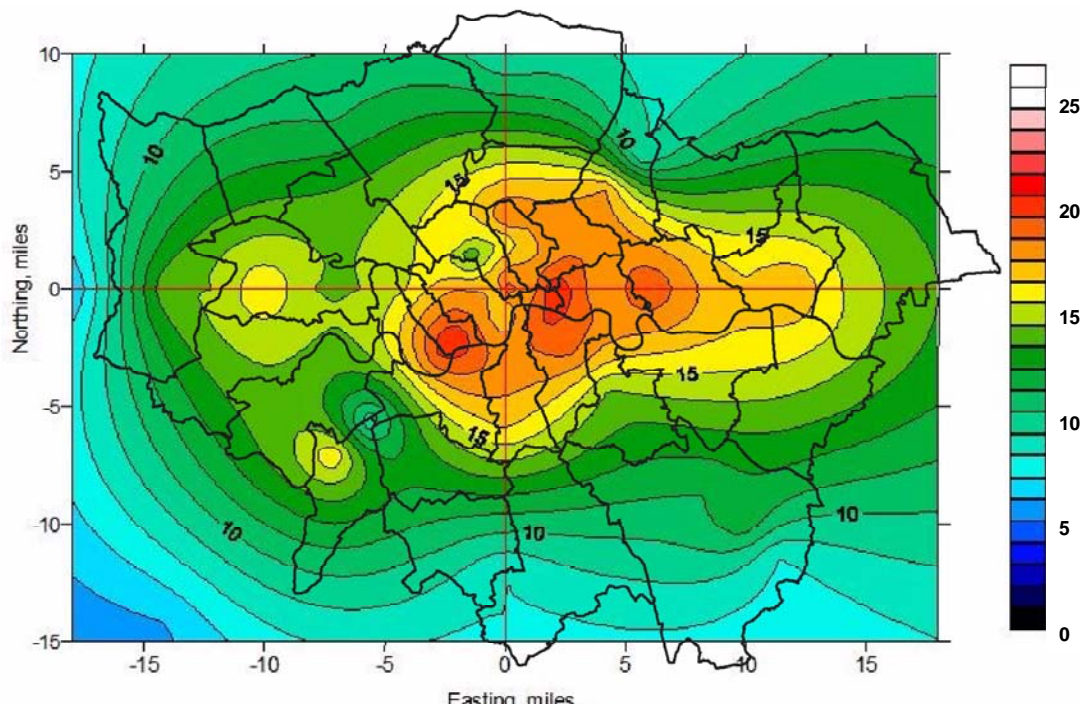
Figure 8.2 Map showing Flood Risk in London



London also experiences the phenomenon of the ‘urban heat island’ effect whereby central London is significantly warmer at night compared with surrounding, more rural locations. This is due to the absorption of heat by buildings and roads during the day (from local heat sources or by solar heating), which is subsequently released at night as the ambient air temperature decreases. This additional heating can raise night time temperatures significantly above those of more rural areas. This can lead to considerable discomfort and potential health impacts on vulnerable people such as the elderly.

Figure 8.3 below illustrates the heat island effect for an average summer night in 2000 and shows the difference in temperature between central London and the surrounding area. The effect is most pronounced in inner London. The central cross indicates the location of the British Museum while the blue area in the southwest is Richmond Park.

Figure 8.3 London's Heat Island



It is accepted that some degree of climate change is now inevitable. However, it is impossible to predict exactly how these changes will impact on London specifically, it is likely that the direction and speed of change will be such that climate change effects are likely to be increasingly felt over the period that will be covered by the draft replacement London Plan.

Over time London can expect to experience warmer and wetter winters, and hotter and drier summers, with more frequent and intense extreme weather events. The significant impacts of these conditions on London are the increased probability of drought and overheating during summers, and increased risk (both the probability and the consequences) of flooding from increased river flows, more intense rainfall and increasing sea levels and surge tides. Climate change will also affect both water supply and demand given hotter summers will increase water lost to evaporation, lower levels of replenishment to water resources, and an increase in the demand for water from a growing population.

The latest UK climate projections published by the UK Climate Impacts Programme on behalf of the Department of the Environment, Food and Rural Affairs were published in the Summer of 2009. The projections, UKCP09, are based on the latest modelling work of the Meteorological Office's Hadley Centre and provide the most detailed projections for London yet.

According to the UKCP09 projections, it is likely London will be impacted by more frequent and higher tidal surges, higher sea levels, an increase in the flow of the Thames and other rivers, and more surface water flooding as a result of run off. These impacts are likely to mean a significant proportion of London's critical and emergency

infrastructure could be at increased risk from flooding, particularly given the extent of growth we expect in London over the period covered by the new plan (for example there are likely to be more people living and working on the floodplain). Further information can be found in the Mayor's draft London Climate Change Adaptation Strategy.

A further problem arising from climate change will be an increasing shortage of water, which has been highlighted by recent periods of drought in London. South East England is already water stressed, and drought conditions have been experienced in London in recent years (for example, the hot summer in 2003 and the dry winters of 2004-05 and 2005-06). During particularly dry weather, London's water consumption outstrips available supply. There is limited water for today's population, and per capita water usage is increasing.

Eighty percent of London's water comes from the Thames and the River Lee, and the remaining 20 percent comes from London's subterranean aquifer. These sources are fed by rainfall mostly in the winter. Further information regarding the quality of these water sources can be found in the baseline summary for Chapter 7.

Londoners consume an average of approximately 168 litres of water per person per day as compared to a national average of 150 litres per person per day. Only one in five households currently has a water meter, and approximately a quarter of all water distributed in the mains network is lost to leakage (largely due to old Victorian era pipes). Therefore the continuation of these trends could lead to abrupt and significant water shortages in London.

In 2006/07, London produced the second highest amount of municipal waste in England, over 4.2 million tonnes, of which just over 80 percent was from households. The amount of waste per household was just below average at 1.33 tonnes compared with 1.36 tonnes for England as a whole, with the North East and North West regions having the highest amounts (both 1.43 tonnes).

Despite London's rising population and economic growth, the total amount of waste produced has fallen slightly since 2000, with a 5 percent reduction in total municipal waste produced between 2000/01 and 2006/07. However, this decrease has been achieved largely due to a decrease in non-household waste collected by local authorities of more than 25 percent, with the household total remaining fairly stable. Within the household fraction however, recycling has more than doubled since 2000/01 (rising from 9 percent to 23 percent), though London recycled the least household waste of any English region in 2006/07.

In 2006/07, 57 percent of London's municipal waste was sent to landfill. At just under 2.5 million tonnes London landfilled the third largest amount of municipal waste in England after the North West and South East. London incinerated more municipal waste than any other region (929,000 tonnes), which was more than it recycled (just under 850,000 tonnes).

With a rising population and economic growth in the medium to long term it is expected that these trends will continue and significantly London's landfill capacity could be exhausted within the period of the new London Plan.

8.1.2 Policies

Chapter 5 contains policies primarily intended to support the Mayor's vision for London and the fifth objective that states that London should be:

A city that becomes a world leader in improving the environment locally and globally, taking the lead in tackling climate change, reducing pollution, developing a low carbon economy and consuming fewer resources and using them more effectively.

The Mayor has set out his commitment to making London a world leader in tackling climate change in his vision and objectives for the London Plan (as highlighted above). This chapter sets out a comprehensive range of policies to underpin London's response to climate change, including underlying issues of resource management (including waste management, the production of aggregates, and water resources). The policies are designed to be read and applied in conjunction with other policies within the draft replacement London Plan and seek to ensure that climate change and environmental issues are fully taken into account.

Key Baseline:

- In 2006/07, London produced the second highest amount of municipal waste in England, over 4.2 million tonnes, of which just over 80 per cent was from households (Source: Focus on London 2008 - Chapter 9: Environment).
- Energy use in existing homes is the largest single source of carbon dioxide emissions in London: the majority being from the use of natural gas, most likely used for space heating and hot water provision (Source: Focus on London 2008 - Chapter 9: Environment).
- London still ranks as the poorest in regional terms for biological and chemical quality of rivers in England and Wales. However, the percentage of good biological quality water (rated very good or good) in the capital has increased from 11 per cent in 1990 to 21 per cent in 2006. The percentage of good chemical quality by water has increased almost three fold, from 13 per cent in 1990 to 36 per cent in 2006 (Source: Focus on London 2008 - Chapter 9: Environment).
- Each Londoner consumes an average of 168 litres per day, compared to the national average of 150 litres per person per day. This increased consumption is primarily linked to affluence and lower occupancy rates (Source: The London climate change adaptation strategy, 2008).
- London is responsible for 8% of the UK's emissions, producing 44 million tonnes of CO₂ each year (Source: The Mayor's Climate Change Action Plan, 2007).

Climate change is a fundamental challenge facing London and the whole world, and is arguably one of the most serious threats to the long term quality of life, particularly for future generations – a key element of sustainability. Consequently, it is important that it is mitigated, primarily through the reduction in emission of greenhouse gases (the most common of which is CO₂). However, it is recognised that even if all greenhouse gas emissions from human activities stopped now, there would still be some effects on the climate and continued global warming for a number of decades until a stabilisation point is reached. Consequently, the chapter also contains policies that seek to adapt to the anticipated climate change.

Indeed, the chapter contains policies that relate to flood risk management, sustainable drainage and wider water resource issues, energy, addressing overheating, urban greening, including green roofs, as well as waste management, hazardous substances and aggregates.

The following policies relating to London's response to climate change are presented within Chapter 5 of the draft replacement London Plan.

Policies in Chapter 5 (London's Response to Climate Change)	
Policy 5.1: Climate change mitigation	Policy 5.12: Flood risk management
Policy 5.2: Minimising carbon dioxide emissions	Policy 5.13: Sustainable drainage
Policy 5.3: Sustainable design and construction	Policy 5.14: Water quality and sewerage infrastructure
Policy 5.4: Retrofitting	Policy 5.15: Water use and supplies
Policy 5.5: Decentralised energy networks	Policy 5.16: Waste self-sufficiency
Policy 5.6: Decentralised energy in development proposals	Policy 5.17: Waste capacity
Policy 5.7: Renewable energy	Policy 5.18: Construction, excavation and demolition waste
Policy 5.8: Innovative energy technologies	Policy 5.19: Hazardous waste
Policy 5.9: Overheating and cooling	Policy 5.20: Aggregates
Policy 5.10: Urban greening	Policy 5.21: Contaminated land
Policy 5.11: Green roofs and development site environs	Policy 5.22: Hazardous substances

The Mayor is taking steps to tackling climate change through policies and programmes that seek to reduce London's CO₂ emissions and to manage resources more effectively. Under the Greater London Authority Act 2007, the Mayor has a new statutory duty to contribute towards the mitigation of and adaptation to climate change in the UK. The Mayor has produced a draft strategy for Climate Change Adaptation and a draft strategy for Climate Change Mitigation and Energy will be published in autumn 2009. Other mayoral strategies focus on specific aspects of the environment (e.g. waste management, air quality, water, and biodiversity). The policies set out in the London Plan will be complemented and reinforced by those set out in the Mayor's other strategies, and will be supported by national, European and international policies.

8.2 Summary of the effects of Chapter 5 (London's Response to Climate Change)

It is anticipated that Chapter 5 is likely to have a positive effect towards addressing climate change issues through a reduction in CO₂ emissions. The implementation of these policies will ensure that new developments are also likely to be better adapted to the predicted changes in climate through sustainable design, as well as higher levels of resource efficiency. The increased level of energy efficiency and the promotion of renewable energy sources as well as decentralised energy networks will help to deliver a reduction in CO₂ emissions. It is also recognised that improvements in waste management capacity within London will help reduce the need to transport waste to other regions. It will also help make more efficient use of resources by providing greater capacity for recycling and reprocessing waste, as well as extracting energy. Similarly, it is likely to reduce the volume of waste going to landfill.

The measures to address climate change issues and the promotion of decentralised energy networks to provide a secure source of energy are likely to help support a stable economy by reducing, to some extent, the fluctuations, uncertainties and vulnerabilities associated with the effects of climate change on businesses.

It is recognised that the policies in Chapter 5 do not have a significant effect upon some objectives as policies elsewhere in the London Plan address and mitigate such issues. Further information is provided in **Appendix I**.

8.3 Assessment of Chapter 5 (London's Response to Climate Change)

1. Regeneration & Land-Use: To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities.

The policies were examined against the objective but no significant effects were identified

However, it is noted that minor effects may arise as a result of Policy 5.10 (Urban greening), which promotes and supports urban greening, including new planting in the public realm and green infrastructure. Indeed, it is recognised that street trees can contribute enhance the quality and sense of place, which can benefit communities, particularly when combined with other more fundamental regeneration initiatives.

2. Biodiversity: To protect, enhance and promote the natural biodiversity of London.

The policies were examined against the objective, but no significant effects were identified.

However, it is noted that Policy 5.3 requires the highest standards of sustainable design and construction to be achieved within London, which includes promoting and protecting biodiversity and green infrastructure. Similarly, Policies 5.10 and 5.11 promote urban greening and green roofs respectively. One of the objectives of green roofs in particular is to enhance biodiversity. Green infrastructure (including green roofs) provide habitat for wildlife, particularly insects that support the wider food chain, including many bird species, such as house sparrows and are recognised as being beneficial to biodiversity (Mayor of London (2008) *Living Walls and Roofs*, GLA, London).

Additionally, measures to improve water quality (set out in Policy 5.14) are likely to enhance the aquatic habitat and is anticipated to contribute towards improved biodiversity, a trend recognised in the baseline by the improvement in biological water quality (Mayor of London (2007) *Greener London – The Mayor's State of the Environment Report for London*, GLA, London).

3. Health and Well-being: To maximise the health and well-being of the population and reduce inequalities in health.

A detailed Health Impact Assessment of the chapter was undertaken (refer to **Appendix B** for more information). It noted that excessive heat can affect health. The chapter contains policies to increase urban greening, green roofs and green infrastructure more generally, as well as more direct methods of reducing overheating. New planting, particularly of the 10,000 street trees in 40 areas around London (Mayor of London (2008) www.london.gov.uk/streettrees), will help reduce the heat island affect and will cool ambient air temperatures. Similarly, Policy 5.3 calls for the highest sustainable design and construction methods, in particular to avoid internal overheating and contributing to the heat island effect. Consequently, it is likely to contribute positively towards improving health, particularly among those most vulnerable to heat related illnesses such as the old, young and those with respiratory illnesses (refer to the Health Impact Assessment in **Appendix B** for more information).

KEY EFFECTS:

A number of policies seek to reduce the effects of the urban heat island affect which will reduce overheating in the region. This will contribute positively towards people's health.

Furthermore, the promotion of green infrastructure, particularly trees, can help improve air quality by filtering out particulates and other pollutants and alleviating stress.

In addition green infrastructure will help to improve air quality by filtering particulates (notably PM₁₀). This is likely to help those with respiratory conditions. Furthermore, it is recognised that contact with trees and vegetation can help alleviate stress, which will be beneficial for people's health (Mayor of London (2005) *Connecting Londoners with Trees and Woodlands*, GLA, London). Indeed, the Health Impact Assessment also found that the promotion of urban greening, particularly green roofs, can have a positive indirect effect on mental health by providing access to private gardens and improving the physical appearance of an area.

4. Equalities: To ensure equitable outcomes for all communities, particularly those most at risk to experience discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London.

An Equalities Impact Assessment was undertaken for this chapter (refer to **Appendix C** for more details). Policies setting out measures to ensure that all new homes are increasingly energy efficient (Policy 5.2 and Policy 5.3) are likely to help reduce energy bills of the households. This is considered to benefit those on low incomes (refer to the Equalities Impact Assessment in **Appendix C** for more information). Similarly, using retrofitting to implement the Mayor's standards on sustainable design and construction (Policy 5.4) are also considered to be beneficial, as they will reduce resource consumption that may help to reduce bills.

KEY EFFECTS:

Policies in the chapter promote the highest standards of sustainable design and construction that will minimise resource use, particularly energy and water. This is anticipated to contribute positively towards the objective by reducing utility bills required by households, particularly those on low incomes.

5. Housing: To ensure that all Londoners have access to good quality, well-located, affordable housing.

Policy 5.3 requires the highest standards of sustainable design and construction to be implemented. This will ensure that new homes are built to a high quality with low and efficient resource consumption. Similarly, Policy 5.2 sets out the stepped increase to zero carbon housing by 2016. This is anticipated to ensure that homes are highly energy efficient and will therefore contribute positively to the objective. Furthermore, Policy 5.4 sets out the requirement for retrofitting existing housing stock to ensure that they become more resource efficient. Consequently, it is anticipated that the policies in the chapter will contribute positively towards the objective.

KEY EFFECTS:

A number of policies in the chapter will contribute positively towards the objective. This is due to the fact that they set out the requirements for well built, resource efficient and sustainable homes, as well as retrofitting existing housing stock to become more efficient.

6. Employment: To offer everyone the opportunity for rewarding, well-located and satisfying employment.

The policies were examined against the objective but no significant effects were identified. However, the policies are likely to drive demand for 'green' goods and services, which may stimulate new job opportunities and is generally likely to have a beneficial effect on London's economy (see below).

7. Stable Economy: To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.

Unmitigated climate change and inadequate adaptation to the effects of climate change can affect the stability of the economy. Indeed, the Stern Review (Sir Nicolas Stern (2007) *The Economics of Climate Change – The Stern Review*, HM Treasury, London) highlighted that the cost of climate change could be between 5 and 10% of global GDP. Consequently, many of the policies set out in the chapter are likely to contribute towards mitigating or adapting to climate change and are therefore considered to contribute positively towards supporting a stable economy.

Fundamental to the stability of the economy is ensuring a secure energy supply. A secure energy supply will help provide an adequate supply of affordable energy to enable businesses to function, whilst also reducing reliance on fossil fuels, thereby addressing climate change (Mayor of London (2006) *The Mayor of London's Submission to the Energy Review*, GLA, London). To this extent, the policies within the chapter that seek to enhance resource efficiency (particularly in terms of energy resources) are anticipated to contribute positively to the objective of a stable economy, by reducing the costs to households and businesses and therefore increase the amount of money that can be invested to support the economy. Similarly, Policy 5.5 (Decentralised Energy Networks), Policy 5.6 (Decentralised Energy for Development Proposals) and Policy 5.7 (Renewable Energy) are likely to increase the security of energy supply by

KEY EFFECTS:

Climate change threatens the stability of the economy and, left unmitigated, is anticipated to cost up to 10% of global GDP. The policies in the chapter set out mitigation measures and adaptation that is likely to help reduce the effects of climate change and provide a more robust and stable economy.

Furthermore, an affordable and secure energy supply is important to a stable economy and many policies aim to reduce consumption through better efficiency, as well as increase generation from renewable sources and other innovative energy technologies.

reducing the reliance on imported energy, or centralised energy networks (i.e. energy generated for the National Grid).

Furthermore, Policies 5.5 and 5.6 support the use of decentralised energy networks. Indeed, the Mayor expects 25% of heat and power to be generated through the use of localised decentralised energy systems by 2025. Additionally, Policy 5.7 sets out the need to increase the amount of energy generated by renewable sources, with 3,430 GWh of electricity generated by 2025. This would be a significant increase on existing levels. Innovative energy technologies, such as hydrogen fuel cell technology for vehicles, are also promoted.

8. Flood Risk and Climate Change Adaptation: To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.

In order to meet the demands of a growing population within the boundary of London, redevelopment on brownfield sites is important, although many large brownfield sites (including 40% of identified opportunity areas) are located within flood zones (GLA (2007) *Draft Regional Flood Risk Appraisal*, GLA, London). However, the SHLAA considered flood risk issues when calculating the potential housing capacity in London, which helped inform the housing target set out in Chapter 3. Policy 5.12 also emphasises the importance of considering flood risk for new development. Consequently, development will not take place at sites considered unsuitable due to the risk of flooding.

KEY EFFECTS:

The chapter sets out a number of policies designed to adapt to the effects of climate change and minimise the risks from flooding. Consequently, it is considered that it is likely to positively contribute towards the objective.

It is acknowledged that climate change is likely to result in warmer, wetter winters and hotter, drier summers with a greater risk of heatwaves, droughts and flooding. Many policies in the chapter seek to address and ensure adaptation to such climatic changes and are likely to contribute positively towards the objective. In particular, Policy 5.9 ensures that the urban heat island effect is reduced by ensuring developments minimise the need for active cooling through effective and energy efficient design. The promotion of urban greening and green roofs (Policy 5.10 and 5.11) will also help to reduce the urban heat island effect by providing vegetation that can help cool the surrounding air through evapotranspiration and provide shading.

Policy 5.12 covers flood risk management and requires developments to comply with PPS25. It is likely to contribute positively towards the objective by ensuring that London is able to adapt to the effects of climate change and manage flood risk. Sustainable drainage (Policy 5.13) is also important in adapting to climate change and minimising flood risk as it aims to ensure that new developments have low run-off rates, comparable to greenfield rates, thereby reducing the risk of surface flooding. Additionally, Green roofs (Policy 5.11) can also contribute to sustainable drainage, and can effectively reduce the risk of localised flooding by reducing surface run-off. Indeed, in summer, green roofs can retain between 70% and 80% of rainfall run-off (Mayor of London (2008) *Living Roofs and Walls*, GLA, London). It is noted that baseline evidence highlights a positive trend in terms of no net loss of functional flood plain (Mayor of London (2009) *Annual Monitoring Report 5*, GLA, London) and this is likely to continue as unsuitable land for development has not been considered by the SHLAA.

The Environment Agency identifies London as an area of serious water stress due to limited resources coupled with high demand. The predicted effects of climate change are likely to exacerbate the pressure on water resources. The efficient use of water resources is promoted through policies aimed at improving resource efficiency as a result of sustainably designed buildings and collaboration with appropriate agencies (including those of neighbouring regions) to protect and conserve water supplies. Indeed, Policy 5.10 (Sustainable drainage) promotes the storage of water for future use, whilst Policy 5.15 (Water use and supplies) highlights the requirement for residential developments to meet a consumption target of at 105 l/p/d. The chapter also highlights that the Code for Sustainable Homes level 3 will be the minimum standard for social funded homes with the aim of implementing higher levels during the lifetime of the London Plan, with consequential lower water consumption rates (more details are set out in the Mayor's *Housing Strategy* (2009)). The policy also highlights that water loss through leakage will be reduced. Policy 5.4 (Retrofitting) highlights how water resource efficiency may be improved in existing building stock. Indeed, the Environment Agency highlights that a 14% reduction in water consumption can be achieved through retrofitting, which is likely to contribute towards adapting to climate change (Environment Agency (2009) <http://www.environment-agency.gov.uk/research/library/publications/41043.aspx>).

9. Climate Change Mitigation and Energy: To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.

Baseline evidence highlighted that in 2003 London accounted for 8% (44 million tonnes) of the total UK CO₂ emissions (Mayor of London (2007) *Greener London – The Mayor's State of the Environment Report for London*, GLA, London). The majority of this (71%) was generated by the domestic, and commercial and public sectors. More recent data has suggested that emissions have increased to approximately 47.5 million tonnes, but still accounts for 8% of annual UK emissions. However, it is recognised that due to the large population, aggregate totals do not place the emissions in context. Indeed, London has amongst the lowest domestic CO₂ emission rate per capita for all of the UK regions (Mayor of London (forthcoming) *Draft Climate Change Mitigation and Energy Strategy*, GLA, London).

KEY EFFECTS:

The chapter contains a number of policies designed to reduce the demand for energy, whilst improving the efficient use of such resources. Better designed homes, retrofitting and decentralised energy networks are likely to contribute positively towards the objective.

A number of policies are likely to contribute towards the objective by minimising CO₂ emissions and achieving greater energy efficiency. Policy 5.1 highlights that the Mayor seeks to achieve an overall reduction in London's CO₂ emissions of 60% by 2025. It is noted that the London Plan cannot achieve the 60% reduction in CO₂ emissions purely by itself, but requires a concerted effort by all of London's social and economic elements. Consequently, the London Plan sets out a number of policies to reduce emissions from across a number of different sectors. Indeed, Policy 5.2 sets out the step approach to increasing the efficiency of new buildings that will result in zero carbon residential dwellings being built from 2016 and zero carbon non-domestic buildings implemented from 2019. In addition, retrofitting is proposed to help reduce the emission of CO₂ from the region's existing building stock by improving their energy efficiency.

As mentioned for objective 7 (Stable Economy) above, there are a number of policies aimed at promoting the installation of decentralised energy networks to generate 25% of London's heat and power by 2025. These are anticipated to be based upon the use of gas fired combined heat and power (CHP) units. By generating energy and heat at point of use makes the network more efficient and reduces the need for additional energy requirements for heating, as well as making London more self sufficient with greater energy security. Policy 5.7 promotes renewable energy, which states that by 2025 there will be some 3,430 GWh of electricity generation from renewable sources and 8,272 GWh of heat.

In combination with measures elsewhere in the London Plan to reduce energy demand, improve energy efficiency and therefore reduce CO₂ emissions, it is anticipated that there is likely to be a positive contribution towards the objective and the promotion of sustainable energy sources.

10. Water Quality & Water Resources: To protect and enhance London's waterbodies and the Blue Ribbon Network.

Water quality has generally been improving in London over the last decade (Mayor of London (2007) *Greener London – The Mayor's State of the Environment Report*, GLA, London). However, it is noted that combined sewer overflows (when precipitation and sewage volume exceeds the capacity of the drains) results in millions of tonnes of raw sewage being discharged into the Thames each year. Water quality is addressed in Policy 5.14 that states that the Mayor will work in partnership with appropriate agencies within London and adjoining local planning authorities to protect and improve sewage treatment and water quality. In addition to ensuring adequate sewage waste capacity, Policy 5.13 sets out the need for sustainable drainage to minimise the discharge of rainwater to combined sewers, promoting higher aspects of the drainage hierarchy including storage for use, infiltration, attenuation of water for gradual release, discharge in to watercourses, or discharge in to surface water drains. Reducing the volume of water going being discharged from combined sewer overflow events is likely to help continue to improve the water quality of the Thames and the wider Blue Ribbon Network. Further consideration is given to the Blue Ribbon Network in policies elsewhere in the London Plan, notably Chapter 7.

KEY EFFECTS:

The chapter contains policies to reduce increase sewerage capacity and reduce the frequency of combined sewer overflow events. In combination with improvements to sustainable drainage there is likely to be a positive contribution towards water quality by reducing the frequency of discharge of raw sewage.

11. Waste: To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.

The London Plan contains policies addressing waste. In particular, the Mayor believes that waste is potentially a valuable resource that can be exploited. Policy 5.16 sets out the desire to manage as much of London's waste within London as practicable. Working with a range of relevant stakeholders, the Mayor will seek to minimise waste, encourage reuse and recycling by 50% by 2020 for municipal solid waste, 70% by 2020 for commercial and industrial waste, and 95% by 2020 for construction,

KEY EFFECTS:

The chapter contains a number of policies designed to increase waste management capacity within London to increase self-sufficiency. A number of targets are set out to increase the re-use and recycling of municipal, commercial and construction and demolition waste, all of which are likely to positively contribute to the objective.

excavation and demolition waste. This is likely to contribute positively towards the objective, although the aggregate volume of waste produced is likely to increase as a result of the growth in the population and number of households.

As well as policies that aim to reduce the volume of waste generated per capita to support self sufficiency of waste management within London, Policy 5.17 sets out the support for increased waste processing capacity in London and that boroughs identify suitable sites for waste management, including, where relevant, taking a collaborative approach to managing their waste allocations.

Policy 5.18 focuses on construction, excavation and demolition waste and supports the movement of waste by water or rail wherever practicable from construction sites to waste management sites. Measures to manage hazardous waste in the region are set out within Policy 5.19. The Mayor will work collaboratively with the boroughs, Environment Agency, industry and neighbouring regional and local authorities to identify the capacity gap for dealing with hazardous waste. This will help London manage waste and will avoid the use of landfill so far as possible by treating and reprocessing hazardous waste streams.

Consequently, the chapter is likely to contribute positively towards the objective.

12. Accessibility and Mobility: To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).

The policies were examined against the objective but no significant effects were identified.

13. Built and Historic Environment: To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces and appropriately designed.

The policies were examined against the objective but no significant effects were identified.

14. Liveability and Place: To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.

The policies were tested against the objective. Issues and effects related to the liveability and sense of place are predominantly addressed by policies elsewhere in the draft replacement London Plan, however the policies addressing climate change may enhance and support these other policies to enhance liveability and place making in London.

15. Open Space: To protect and enhance natural open space in London.

The policies have been examined against the objective but no significant effects were identified.

However, it is recognised that Policy 5.10 (urban greening) may contribute towards the provision of open spaces such as public squares.

16. Air Quality: To improve London's air quality.

Air quality in London has improved in recent years, with NO_x and PM₁₀ having reduced by 13% and 24% respectively over the 10 years to 2007 (Mayor of London (2007) *Greener London – The Mayor's State of the Environment Report for London*, GLA, London), although it still exceeds a number of national and EU targets. The promotion of urban greening and green roofs can help to improve air quality by filtering pollutants and increasing oxygen concentrations. Policy 5.6 promotes CHP, although the supporting text notes that such systems should be designed to minimise negative impacts on air quality from the combustion of fuels.

KEY EFFECTS:

Air quality may be improved by the promotion of urban greening and green roofs.

9. Assessment of Chapter 6 (Transport)

9.1 Summary of Policies in Chapter 6 (Transport)

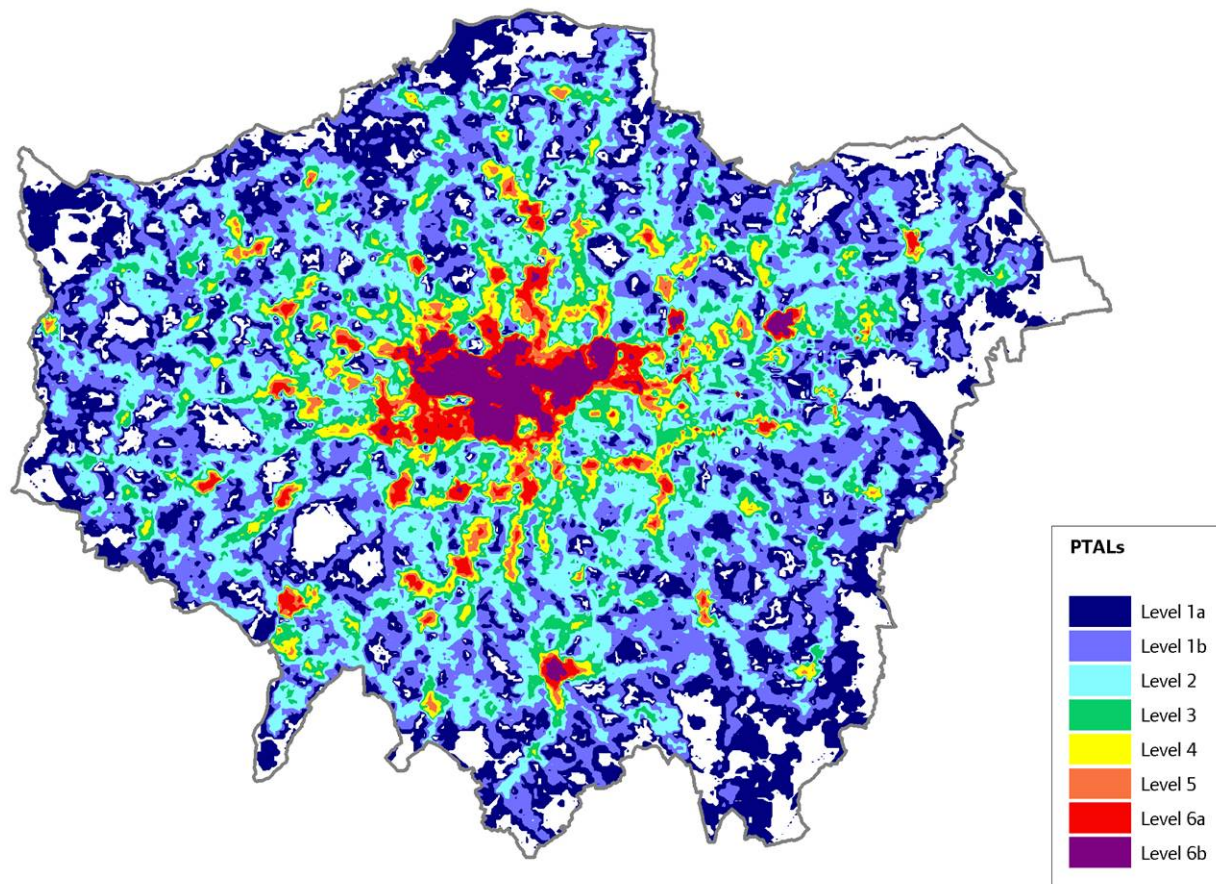
9.1.1 Baseline Summary

Transport issues will be principally addressed in the review of the Mayor's Transport Strategy, which is being undertaken in parallel to the London Plan review. However, improvements to London's transport system and accessibility for all Londoners will remain key considerations for the London Plan to address where it can. Importantly the new London Plan will need to ensure coordination of land use and transport planning and the provision of infrastructure and services to address the needs of a growing and increasingly diverse city.

The most recent census information shows that people in London generally travel further by public transport, by bicycle and on foot as compared to those in other regions in Great Britain. In 2007, on an average day in London, 23.8 million trips were made, 33 percent of which were by public transport, slightly more than in 2005. There has been a substantial net shift away from private transport and towards public transport. Between 2000 and 2007, the proportion of journey stages made by public transport rose from 33% to 40% while the proportion made by private transport, principally car, has fallen from 44% to 33%”

London benefits from a well developed public transport network, which includes the Underground, National Rail services and an extensive bus network, which provide a high level of transport accessibility. **Figure 9.1** below shows the existing public transport accessibility levels across London, based on the Public Transport Accessibility Levels (PTAL) methodology that is assessed by Transport for London. PTALs provide a consistent framework for assessing public transport accessibility and can be estimated for the future years based on considerations of future transport investment. The highest PTALs are located in and around central London and town centres where most public transport infrastructure is focused.

Figure 9.1 Map showing Public Transport Accessibility Levels (PTAL) for London



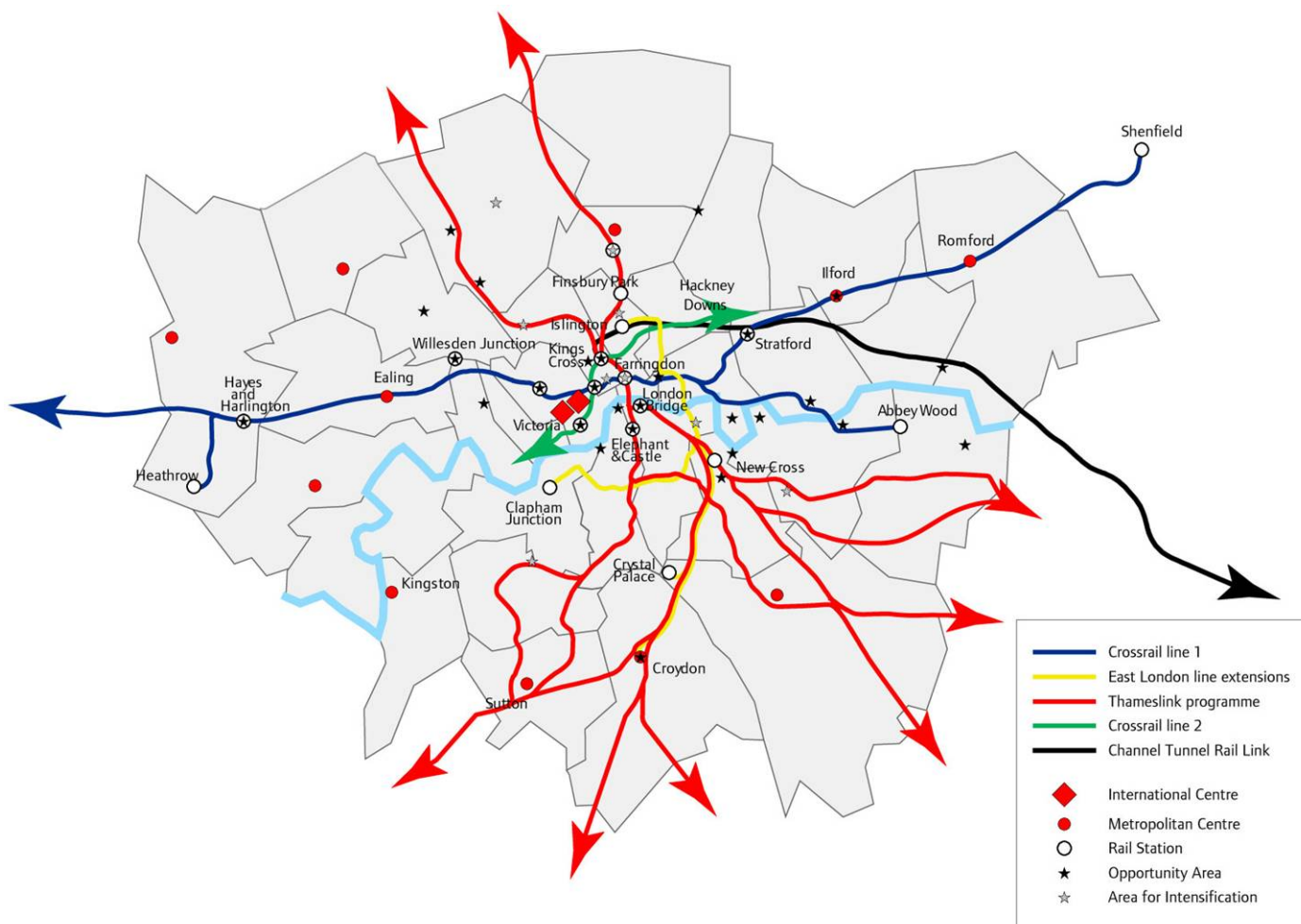
The use of public transport including buses, Underground, DLR and Tramlink has risen to its highest levels since the 1950s. The use of public transport has continued to grow faster than the use of private cars as shown in the latest AMR (KPI 12). These results show a 22 percent increase in public transport journeys per head of population between 2001 and 2007, as compared to a 9 percent decrease in car journeys per head.

The lowest number of miles traveled by cars and other private road vehicles also occurs in London. In 2006, over 1.1 million people entered central London between 7am and 10am on an average working day. Forty four percent made all or some of their journey by rail, 34 percent were made by London Underground or DLR, 10 percent were by bus and 7 percent by car. However, the average time taken to travel to work in London is 43 minutes, the highest in the United Kingdom. For other regions, mean commuting times varied between 21 and 24 minutes.

It is expected that these trends will generally continue within London, especially given the proposed transport investments outlined in the current London Plan (the key rail proposals are outlined in **Figure 9.2**). However, without the London Plan's approach to integrating development with existing and future public transport infrastructure and services, as well as exploiting existing areas of good public transport accessibility and promoting

demand management, it is expected that the use of private cars would grow and would result in negative impacts on the environment and increased congestion.

Figure 9.2 Map showing Proposed Major Rail Transport Schemes and Development Opportunities in London

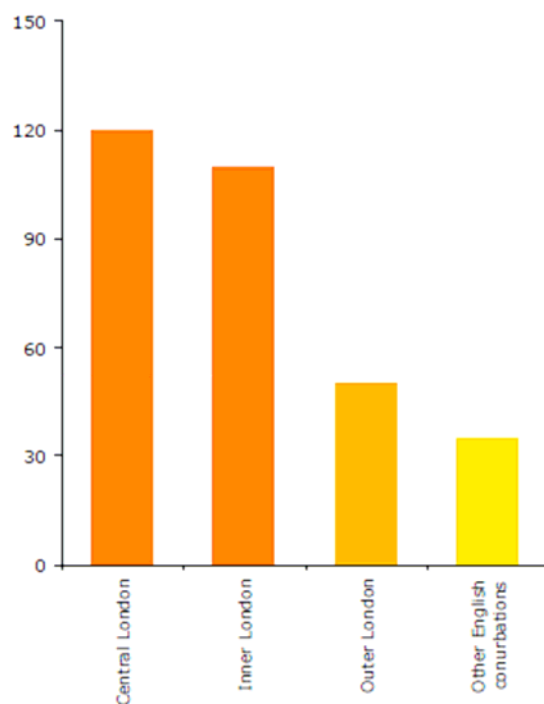


(Source: London Plan 2008)

London has a significant problem with road congestion and according to some estimates could cost up to £2 Billion per year in lost time and productivity. Average traffic speeds have fallen steadily over the past 50 years and in inner London road traffic speeds are now half those in other major English cities.

Figure 9.3 highlights the relative delay incurred during the weekday peak period in central, inner and outer London, and other urban areas in England. The high congestion levels in central and inner London are highlighted by much higher delays per vehicle kilometres travelled. Notwithstanding these trends, initiatives such as the London Congestion Charge have cut congestion in the charged zone by 30 percent.

Figure 9.3 Weekday Peak Road Congestion (Seconds lost per vehicle km)



It is expected that the ongoing emphasis of policies to reduce reliance on private cars and to focus more on more environmentally friendly modes of transport will positively effect road congestion in London. The growth in outer London could significantly increase the pressure on orbital links between town centres, industrial and leisure areas.

Further work is underway to model the transport impacts of future land use scenarios to inform the review of the Mayor's Transport Strategy and the London Plan. This work will principally look at modelling outputs related to public transport, congestion and emissions from transport and will help inform the assessment of different strategic options in the IIA.

A final transport consideration is that of air travel. Between 1987 and 2007 the number of passengers using London's airports (including Luton, Gatwick and Stansted) increased by over 140 percent from over 57 million passengers per year to just under 140 million passengers per year. Heathrow is the busiest airport, with a throughput of nearly 68 million passengers in 2007, which accounts for nearly half of the total volume for all five

Key Baseline:

- People in London travelled further by public transport, by bicycle and on foot than in any other region in Great Britain, whilst the lowest number of miles travelled by cars and other private road vehicles occurred in London (Source: Focus on London 2008 - Chapter 10: Transport).
- The average time taken to travel to work in London is 43 minutes, the highest in the United Kingdom. For other regions, mean commuting times varied between 21 and 24 minutes (Source: Focus on London 2008 - Chapter 10: Transport).
- Transport for London have used a number of initiatives since 2000 with a view to reducing carbon emissions from London transport. This includes the provision of a Low Emissions Zone and Congestion Charge scheme (TfL Environmental Report 2008).

London airports. The government expects that demand for air travel to and from London will continue to grow, although it is too early to assess what impacts the current recession will have on these projections.

9.1.2 Policies

Chapter 6 contains policies primarily intended to support the London Plan's sixth objective which states that London should be:

A city where it is easy, safe and convenient for everyone to access jobs, opportunities and facilities with an efficient and effective transport system which actively encourages more walking and cycling and makes better use of the Thames, and supports delivery of all the objectives of this Plan.

The main source of policy on transport is the Mayor's Transport Strategy, which has been drafted in parallel with the draft replacement London Plan. The Mayor's Transport Strategy sets six thematic goals that link to the six themes of the London Plan. These are:

- Supporting economic development and population growth;
- Enhancing the quality of life for all Londoners
- Improving the safety and security of Londoners;
- Improving transport opportunities for all;
- Reducing transport's contribution to climate change, and improving its resilience; and
- Delivering the London 2012 Olympic and Paralympic Games.

It is noted that the delivery of the Mayor's Transport Strategy is essential to achieving the vision and objectives of the draft replacement London Plan.

The following policies relating to transport are presented within Chapter 6 of the draft replacement London Plan.

Policies in Chapter 6 (Transport)

Policy 6.1: Strategic approach	Policy 6.8: Coaches
Policy 6.2: Providing transport capacity and safeguarding land for transport	Policy 6.9: Cycling
Policy 6.3: Assessing transport capacity	Policy 6.10: Walking
Policy 6.4: Enhancing London's transport connectivity	Policy 6.11: Smoothing traffic flow and tackling congestion
Policy 6.5: Funding Crossrail and other strategically important transport infrastructure	Policy 6.12: Road network capacity
Policy 6.6: Aviation	Policy 6.13: Parking
Policy 6.7: Buses, bus transits, trams	Policy 6.14: Freight
	Policy 6.15: Strategic rail freight interchanges

Transport is essential to the efficient functioning of London and to the quality of life for London's inhabitants and visitors. A lack of accessibility can be a major constraint on the success and quality of places, their neighbourhoods and communities. An efficient public transport system, along with adequate provision and encouragement for cycling and walking can help improve the environment by reducing the number of journeys taken by private vehicle, reducing pollutant and greenhouse gas emissions.

Recognising that transport is an essential driver towards addressing the whole range of spatial, environmental, economic and social policy priorities, the policies within this chapter support the integration of transport and development, the connectivity of London, ensure better streets and sets car and cycle parking standards.

9.2 Summary of the effects of Chapter 6 (Transport)

It is anticipated that Chapter 6 is likely have a significant positive effect towards improving the accessibility and mobility of all Londoners throughout the region and beyond.

Improvements to transport infrastructure will help to support regeneration by increasing the accessibility of areas and communities, encouraging businesses to establish within them and allow people to access opportunities across London. It is recognised that the many of the policies will help to improve the flow of traffic and reduce congestion. This will significant help support a stable economy by improving the efficient movement of goods and people. This will enable businesses to plan with more certainty, reduce time costs lost due to congestion and become more productive. Improved traffic flow and reduced congestion will also mean that vehicles can operate with a higher degree of fuel efficiency. As such the emission of pollutants is likely to reduce with consequential improvements in air quality and on human health. It may also enhance the reliability and speed of surface based public transport, which may encourage more people to use sustainable modes of transport.

The projected increase in the population is anticipated to increase pressure on transport infrastructure. If enhancements to transport infrastructure, including additional capacity are not delivered in line with projected population growth then the anticipated benefits against the IIA objectives may be reduced.

Other objectives are addressed or mitigated by policies elsewhere in the draft replacement London Plan. Consequently, no significant detrimental effects are anticipated to arise against such objectives. Further information is included in **Appendix I**.

9.3 Assessment of Chapter 6 (Transport)

1. Regeneration & Land-Use: To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities.

Improvements to transport infrastructure and in particular public transport infrastructure, is likely to stimulate regeneration especially within the disadvantaged areas of inner and outer London. Better transport links throughout London will help integrate disadvantaged and poorly connected communities with more affluent or well serviced areas of London and can help encourage businesses to locate in areas that were previously less accessible. It is therefore considered that the policies will contribute positively towards regeneration and urban renaissance.

KEY EFFECTS:

Transport underpins social and economic activities and has a significant influence on enabling regeneration. Enhanced transport links and infrastructure will help encourage urban renaissance and provide deprived communities with a range of benefits, whilst also linking them with the opportunities available throughout London. As such the chapter is likely to contribute positively towards the objective.

The provision of adequate transport infrastructure is also essential in ensuring that development doesn't exacerbate pressure on existing transport facilities. In the decade to 2005, the number of rail journeys increased by 32%, whilst TfL predicted that in the coming two decades from 2007 rail use would increase by as much as 40%. Capacity levels are currently being exceeded on London and the Southeast rail services by an average of 4.8% during morning peak times and 1.9% during evening peak times (London Assembly (2009) *The Big Squeeze – Rail Overcrowding in London*, GLA, London). Indeed, Policy 6.1 encourages the closer integration of transport and development. Policy 6.2 will help to increase capacity (by securing funding for future improvements and schemes), whilst Policy 6.3 requires development proposals to be tested against transport capacity. Where existing transport facilities cannot meet the additional demand from development proposals, such developments will be required to be implemented in phases. The policy also requires the cumulative impacts of developments on transport requirements to be taken into account. Policy 6.7 ensures that there are improvements in buses, bus transits and trams that will help people, particularly those without access to cars, to become more mobile. These are likely to contribute positively towards supporting regeneration.

Policy 6.12 recognises that improvements to London's road network may contribute to regeneration by improving conditions for pedestrians, cyclists and public transport users. Road improvements can also help reduce

congestion, improving vehicle flow, which is beneficial to improving public transport and, indirectly, the economy. As such it is likely to make a positive contribution towards the objective.

2. Biodiversity: To protect, enhance and promote the natural biodiversity of London.

The policies were examined against the objective but no significant effects were identified.

3. Health and Well-being: To maximise the health and well-being of the population and reduce inequalities in health.

A detailed Health Impact Assessment was undertaken for the chapter (refer to **Appendix B** for more information). The improvements to public infrastructure outlined are likely to increase the uptake of public transport or other sustainable modes of travel, particularly Policy 6.9 (cycling) and Policy 6.10 (walking). Indeed, cycling has increased by 91% since 2000 with over 500,000 trips per day, and is anticipated to have grown by 400% by 2025 (TfL (2008) *Business Plan 2009/10 – 2017/18*, TfL, London). The Health Impact Assessment recognises that the increase in cycling and walking will help increase physical activity and is likely to contribute to health and well-being improvements among the population. However, it is noted that cyclists currently account for a disproportionately high number of people killed or seriously injured on London's roads (London Councils and London Cycle Campaign (2008) *Breaking down barriers to cycling in London*, London Councils, London), although it is recognised that the policies seek to improve safety for such modes of travel, including Policy 6.9 and Policy 6.2.

KEY EFFECTS:

Improving traffic flow, reducing congestion and increasing the uptake of sustainable modes of transport are likely to reduce the emission of pollutants and support improvements in health and well-being.

Policy 6.9 and Policy 6.10 are likely to contribute positively towards increasing health and well-being by improving cycling and walking rates which will increase physical activity. However, it is noted that cyclists account for a disproportionately high level of accidents on roads, although it is recognised that policies exist to improve safety on the roads.

Refer to the Health Impacts Assessment in **Appendix B** for more information.

Improvements to smooth traffic flow (Policy 6.11) and reduce congestion are also likely to contribute positively towards health as a result of reducing the levels of pollution and improving air quality. This is due to the improvements in the efficiency of vehicle movements, resultant quicker journey times and lower emissions.

Policy 6.2 refers to improving the safety of the transport network, which is likely to help reduce accidents and incidents and improve people's health and well-being whilst using the infrastructure.

Further details of the effect of the London Plan on health are set out in the Health Impact Assessment (HIA) in **Appendix B**.

4. Equalities: To ensure equitable outcomes for all communities, particularly those most at risk to experience discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London.

A detailed Equalities Impact Assessment was carried out for the chapter (refer to **Appendix C** for more information). Improvements to transport infrastructure are anticipated to support regeneration (see objective 1).

This is likely to lead to greater links between deprived communities and opportunities available in wider London, particularly employment opportunities. This is likely to help provide greater equality between people from different social backgrounds and different areas to be able to access opportunities elsewhere in London thereby reducing social exclusion due to poor transport links or poverty.

The provision of greater capacity and an improved coverage of public transport throughout London may positively contribute to the equal accessibility of transport to all, particularly in the medium to long term. Improvements made to the accessibility of transport infrastructure (Policy 6.3), such as improved access at stations, may help reduce the potential exclusion of frail or disabled people.

KEY EFFECTS:

Enhanced transport infrastructure is likely to support regeneration. This may help reduce inequalities by providing better links between communities and opportunities across London.

Improvements to transport infrastructure (particularly Policy 6.3) may help improve accessibility that is likely to contribute positively. Refer to the Equalities Impact Assessment in Appendix C for more information.

The Equalities Impact Assessment also identified that the promotion of walking (Policy 6.10) is anticipated to contribute positively towards the objective, particularly in relation to children, young people, women and adults who are more likely to be pedestrians (refer to **Appendix C** for more details).

5. Housing: To ensure that all Londoners have access to good quality, well-located, affordable housing.

The policies were examined against the objective but no significant effects were identified.

6. Employment: To offer everyone the opportunity for rewarding, well-located and satisfying employment.

The improvements in the capacity of public transport in the longer term and greater spatial coverage of transport infrastructure may positively contribute towards the ability for people to travel to appropriate employment locations. It is noted that people with higher qualifications have a tendency to commute further to work than those with a lower qualification (GLA Economics (2009) *Working Paper 36 Commuting Patterns in London by Qualification Level and Employment Location*, GLA, London). This is due to the concentration of employment opportunities requiring high qualification levels being located in fewer locations within London than those opportunities for lower skilled. Consequently, the provision of enhanced transport infrastructure will positively contribute towards the objective. Policy 6.1 encourages closer integration of developments and transport, which will also contribute to the objective by making travel easier, more convenient and an improved experience for passengers.

KEY EFFECTS:

Improved transport will help people access and travel to employment opportunities more easily.

The attraction of business to outer London from the Outer Metropolitan Area as a result of more flexible car parking provision will generate employment and have a positive contribution.

Enhanced transport links are also likely to benefit deprived communities as it will enable them to access employment and education opportunities (including apprenticeships) throughout London more easily due to an increase in capacity or frequency of services. In particular, Policies 6.2 (Providing transport capacity and safeguarding land for transport) and Policy 6.7 (Buses, bus transits, trams) will help support this.

More flexible car parking provision (Policy 6.13) is anticipated a positive effect on securing firms to locate to outer London. This will generate employment opportunities for residents in such areas. This is particularly relevant as outer London competes more with the Outer Metropolitan Area (consisting of parts of the neighbouring regions of South East England and East England), where car parking spaces are more liberal, rather than inner and central London (Outer London Commission (2009) *The Mayor's Outer London Commission: Interim Conclusions*, OLC, London).

7. Stable Economy: To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.

The baseline above highlights that London suffers from high levels of road congestion. Approximately 2 minutes are lost per vehicle kilometre during weekday peak times as a result of road congestion in central London. Some estimates suggest that congestion costs the economy £2 billion per year in lost time and productivity. Consequently, an efficient transport system is essential to support a stable economy. Improving the reliability and speed of movement of people and goods will help businesses to plan with more certainty and can help to improve productivity. The policies in the chapter will improve transport infrastructure and the efficient movement and distribution of freight through and across London (e.g. Policy 6.1, 6.11, 6.14 and 6.15). It is therefore considered that there will be a significantly positive contribution towards the objective.

KEY EFFECTS:

A strong and efficient transport infrastructure will support a stable economy by providing more certainty and efficiency in the movement of people and goods.

The chapter will enhance public transport that will help workers spend less time commuting. It will also improve the efficient movement of freight through the city, reducing time delays and cost.

Policies 6.14 and 6.15 are expected to contribute positively to encouraging a low carbon economy. This is because improvements in the efficiency of freight transport as a result of developing corridors to enable freight to avoid central London will speed up its movement, reducing time costs and the potential for delays.

Policy 6.5 is concerned with the funding of Crossrail and was the subject of a separate IIA (May 2009), which concluded that the policy was unlikely to have any significant positive or negative effects⁴.

8. Flood Risk and Climate Change Adaptation: To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.

The policies were examined against the objective but no significant effects were identified.

⁴ <http://gla-consult.limehouse.co.uk/portal/lpca/>

9. Climate Change Mitigation and Energy: To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.

Baseline evidence highlights how road transport accounted for 22% of London's CO₂ emissions in 2003 (The Mayor of London (2007) *Greener London – The Mayor's State of the Environment Report for London*, GLA, London). The policies within Chapter 6 set out measures to reduce congestion that, according to the existing baseline, currently causes nearly two minutes delay to every vehicle kilometre travelled in central London during peak time. Reducing congestion will improve traffic flow and will lead to reduced journey times and more efficient fuel use, therefore resulting in lower greenhouse gas emissions. In addition, the promotion of sustainable modes of transport, including walking and cycling, will help reduce private vehicle use. It is anticipated that the policies will support the existing baseline trend, which highlights a 9% reduction in private vehicle use since 2009 (Mayor of London (2009) *The Mayor's Annual Monitoring Report*, GLA, London), and will therefore contribute positively to the mitigation of climate change through the reduction in greenhouse gas emissions.

KEY EFFECTS:

The promotion of public and sustainable methods of travel, along with more efficient movement of vehicles may help reduce CO₂ emissions.

Policies 6.1 and 6.3 encourage the closer integration of development with transport and the need for ensuring adequate provision of transport infrastructure is provided to support increases in demand. Currently, public transport use accounts for nearly 40% of modal trips within London, whilst private vehicle use accounts for 38% of modal trips (TfL (2009) *Travel in London - Report Number 1*, TfL, London), and it is anticipated that public transport use will continue to increase. The provision of developments in accessible locations to transport infrastructure will help further discourage private vehicle use and is anticipated to support climate change mitigation. In addition, the policies within the chapter encourage developments to be designed to reduce the need for travel.

Policies aimed at encouraging freight to bypass central London and encouraging strategic freight rail interchanges (Policies 6.14 and 6.15) are anticipated to help reduce congestion and achieve a modal shift of freight from road to rail or water. As road transport accounts for 22% of CO₂ emissions, such policies are likely to help reduce the emission of CO₂ by reducing the number of vehicles required to transport freight.

The relaxation of car parking (Policy 6.13) in outer London to encourage business relocation requires developers to demonstrate the need for regeneration, and that no significant adverse effects on air quality or congestion will occur. It also requires them to highlight that there is a recognised lack, both now and in the future, of public transport. The policy also sets a requirement for electric vehicle parking spaces to be provided. Consequently, no significant detrimental effects are expected to occur.

10. Water Quality & Water Resources: To protect and enhance London's waterbodies and the Blue Ribbon Network.

The policies were examined against the objective but no significant effects were identified.

11. Waste: To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.

The policies were examined against the objective but no significant effects were identified.

12. Accessibility and Mobility: To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).

Many policies encourage and promote the use of more sustainable modes of transport and the closer integration of transport infrastructure and developments should help facilitate a positive modal shift. This is expected to have a positive effect by further increasing the percentage of journeys made by public transport up from 40% in 2007. Policy 6.9 and Policy 6.10 encourage cycling and walking respectively and are anticipated to make such travel throughout London easier and safer, particularly within central and inner London, where a cycle hire scheme will be introduced.

KEY EFFECTS:

There is likely to be a significant positive effect on the accessibility and mobility as a result of the policies within this chapter.

Improvements to the connectivity of London's transport network are set out within Policy 6.2 and Policy 6.4. It is likely to have a positive effect on increasing the provision of public transport routes throughout London, particularly in south and outer London, due to, for example, the extension of the East London Line and improvements to Thameslink. It is considered that Policy 6.4 will contribute positively to the objective as it encourages working with strategic partners in neighbouring regions, which is likely to help provide a more integrated transport network. This will facilitate the efficient flow of commuters and visitors to and from London for work or recreation.

The expansion of the bus and tram network (Policy 6.7) is also anticipated to have positive effects, particularly in outer London and south London where alternative public transport modes are less prevalent. The improvements in public transport, cycle and pedestrian links are likely to help tackling congestion (Policy 6.11), which is likely to help improve mobility in central and inner London. Improvements to the road network capacity (Policy 6.12) are also likely to contribute positively towards the reduction of congestion, by improving vehicle flow, which will also benefit public transport mobility.

13. Built and Historic Environment: To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces and appropriately designed.

The policies were examined against the objective but no significant effects were identified.

14. Liveability and Place: To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.

The policies within the chapter will promote the use of sustainable modes of transport, which will help improve sustainable lifestyles. The improvements to the transport network are also likely to help stimulate regeneration and make accessing London's opportunities easier. As such, there is anticipated to be a positive contribution towards liveability and social cohesion.

KEY EFFECTS:

An enhanced transport system that promotes sustainable modes of transport will contribute towards sustainable lifestyles, improve accessibility and promote social cohesion by integrating communities with opportunities across London.

15. Open Space: To protect and enhance natural open space in London.

The policies were examined against the objective but no significant effects were identified.

16. Air Quality: To improve London's air quality.

Policies 6.9 and 6.10 promote cycling and walking, which emit no pollutants and are therefore likely to contribute positively to air quality. The policies also promote public transport and reductions in congestion. These are likely to help support the existing baseline trends of improvements in air quality (NO_x and PM₁₀ have reduced by 13% and 24% respectively over 10 years to 2007 (Mayor of London (2007) *Greener London - The Mayor's State of the Environment Report for London*, GLA, London)). This is due to reduction in emissions from the more efficient movement of transport and fewer journeys made by private vehicle.

KEY EFFECTS:

Air quality may be improved through the encouragement of public and sustainable transport modes. More efficient vehicle movement may also help to reduce congestion and traffic related emissions.

In combination with other relevant policies tackling congestion (Policy 6.11) there is likely to be an improvement in traffic flow, including for public transport, resulting in more efficient flowing traffic. This is likely to improve fuel efficiency and will help to minimise pollution, thereby contributing positively to air quality.

10. Assessment of Chapter 7 (London's Living Places and Spaces)

10.1 Summary of Policies in Chapter 7 (London's Living Places and Spaces)

10.1.1 Baseline Summary

The physical environments in which people live affect their comfort, enjoyment and sense of place. They also have a strong bearing on their health, well being and quality of life. Poor quality housing, the way new neighbourhoods are designed, the availability of open space, local air quality, levels of noise, and access to services all affect Londoners both directly and indirectly.

Responses to the Mayor's proposals for planning in London⁵ also showed a growing concern with other quality of life issues amongst Londoners. These concerns include:

- Taking effective steps to ensure Londoners feel safe in their city and their local neighbourhoods, and do not have to feel constrained in going about their lives by crime and fears about their safety;
- Protecting and enhancing what is distinctive about the city and its neighbourhoods, securing a sense of place and belonging through high quality architecture and design that sits well with its surroundings;
- Recognising and actively realising the whole range of benefits a network of green and open spaces brings;
- Making sure all Londoners can have access to good quality and healthy food; and
- Protecting and improving environmental quality at both local and London-wide levels (and recognising the links between the two), with action to target problems of air quality and other forms of pollution.

London's quality of life is affected by a number of issues, many of which have already been covered in the preceding sections (such as housing and health). The following focuses on those issues that will be addressed in the new London Plan relating to crime, heritage, open spaces and pollution under the heading of London's Living Places and Spaces.

People's sense of safety in and ownership of their local area is also important. London suffers from a range of crime and disorder problems and has higher rates of recorded crime than other regions in England and Wales. In 2006/07 the total recorded crime rate in London was 124 offences per 1,000 population, which represented the

⁵ Greater London Authority (2008) *Planning for a better London*.

highest crime rate in all of England and Wales (the national average being 100). However, this crime rate has fallen from the high of 2003/04 when it was 145.

The physical and cultural character of London has a significant impact on the quality of life in the region. London's town centres and neighbourhoods reflect the former settlement patterns that have developed over London's long history and therefore provide immense historical and heritage significance. Indeed, some neighbourhoods' most valued and identifiable physical character is derived from listed buildings, conservation areas and World Heritage Sites. Additionally, London's historic environment (including buildings, monuments, landmarks, archaeology and memorials) is integral to its intrinsic character and helps set the spatial form of the region, influences the scale, mass and layout of buildings, streets and neighbourhoods, and informs the relationship between the built and natural environments. This is crucial to people's sense of place – a key contributor to quality of life. English Heritage has identified elements of London's historic environment (including historic assets and landscapes) and a broad brush historic characterisation that may be relevant to the identification of local character in site specific circumstances. It is therefore important that London's regional spatial planning policies support the identification and, where appropriate, protection, of local character.

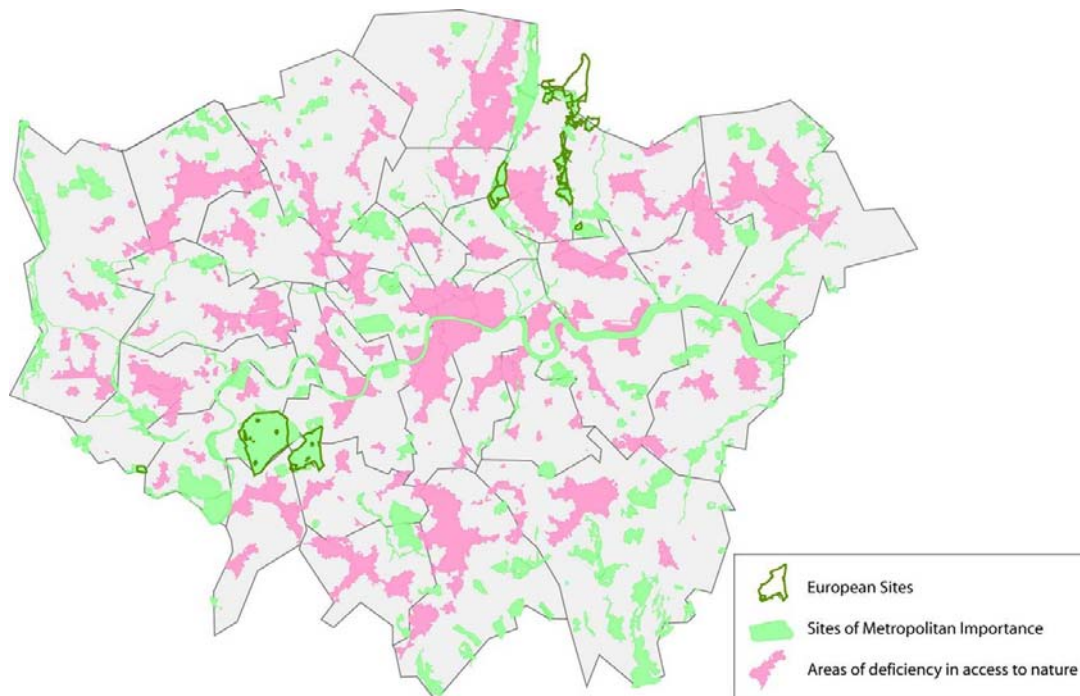
The current London Plan sets a target for reducing the proportion of listed buildings at risk as a percentage of the total number of listed buildings in London (this is also proposed in the draft replacement London Plan). This is currently 2.63 percent based on figures published by English Heritage for the current number of listed buildings at risk (487) versus the total number of listed buildings (18,461).

There has been a steady improvement of the number of buildings at risk year by year since 2004 when this was first measured for the London Plan. English Heritage has published a 'Register of Buildings at Risk in Greater London' annually since 1991, and also the annual survey 'Heritage Counts' since 2002 that outlines designated historic assets and heritage at risk in London. A more detailed 'data document' supports the latter publication, which provides an overview of all designated heritage assets in London by borough.

Notwithstanding London's wealth of open space (highlighted in Section 5.1.1 above) there are still a considerable number of locations within London that have deficiencies in access to nature.

Figure 10.1 below shows these broad areas and highlights that there is a wide geographic spread of deficiencies across London.

Figure 10.1 Deficiencies in access to nature in London



The London Plan sets a target for no net loss of open space designated for protection in Borough planning documents (due to completed new development), and is proposed to be carried forward in the draft replacement London Plan. However, the latest London Plan Annual Monitoring Report reports that there has been a significant loss of open space, in the order of 20 hectares in 2008, due to new development. This is a net figure that takes in account existing open space and proposed additions of open space. This situation is likely to worsen in the future with an estimated 78 hectares of open space to be lost due to proposed new development, although it should be noted that most of this loss is due to a single 64 hectare development in Bexley (Slade Green Rail Freight depot).

The most recent Annual Monitoring Report also highlights a loss of over 18 hectares of nature conservation sites. This is again mainly due to the specific development in Bexley that accounts for a loss of 15.8 hectares of protected habitat. Such loss is likely to be short term though, as the majority of the nature conservation site will be replaced in the future as a requirement of planning permission. The London Plan sets a target of no net loss of protected habitats and previous years have only accounted for maximum losses of around 1 hectare.

Allotments, city farms and community gardens are all forms of urban agriculture in London. They are valuable green spaces that can help improve people's quality of life by promoting healthy food, exercise and community interaction. There are now 16 city farms and over 100 community gardens in the capital. City farms and community gardens are community-managed projects working with people, animals and plants. They range from tiny wildlife gardens to fruit and vegetable plots on housing estates, and to large city farms.

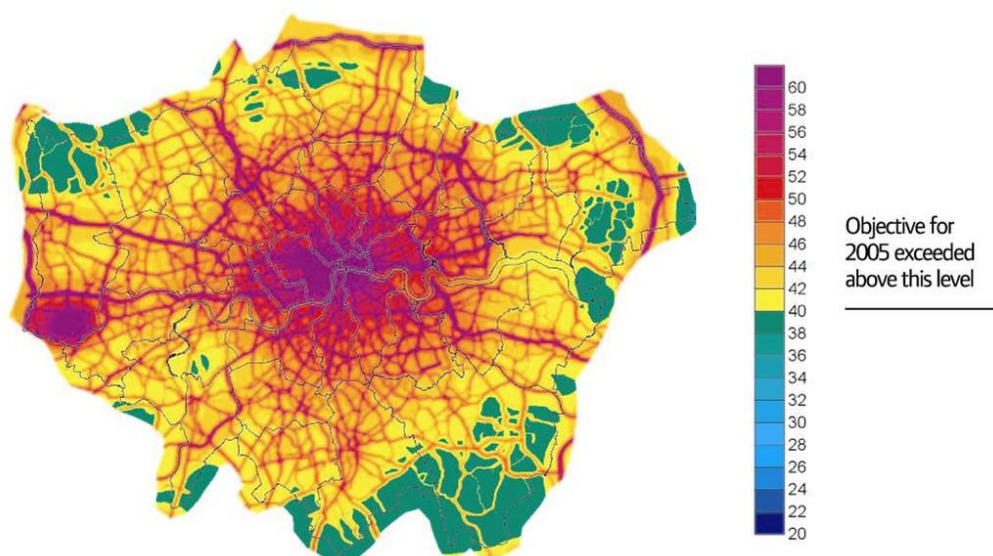
Thirty thousand Londoners rent allotments to grow vegetables and fruit and 14 percent of households grow vegetables in their garden. Interest and participation in gardening is high and there is a shortage of allotment sites in inner London boroughs where contact with nature is at its most pressured. In 2006 London had 737 allotment sites spread across 30 boroughs, with only the Corporation of London, Kensington and Chelsea and Westminster having none. The largest number of sites are found in the outer London boroughs of Brent, Bromley and Ealing, and these also have the highest number of allotments per head of population. The boroughs with the smallest number of allotments per head of population are mostly in inner London.

Pollution levels, whether they relate to the amount of noise an individual is exposed to or air quality, are important considerations for quality of life. Work is currently being undertaken on noise and soundscapes and to identify quiet areas as required by the EU Environmental Noise Directive, and to revise the Mayor's Air Quality strategy (due to be published in 2009).

Noise is a particular nuisance to many Londoners and can disrupt sleep patterns, contribute to hearing loss and stress related health effects. The Chartered Institute of Environmental Health annually compiles noise complaint data from local authorities in England and Wales, including the boroughs in London. The majority of noise complaints are those that come from domestic sources, this is followed by commercial/leisure sources and then by construction and vehicles/machinery in streets. Industry is a very small source of noise complaints in London and complaints appear to be falling. Noise surveys show higher than average noise levels for inner London as compared to outer London. There is also a smaller difference between day and night time noise levels in inner London.

Air pollution can be a major environmental health hazard, and poor air quality is an issue for many world cities. Concentrations of air pollution are monitored on a regular basis at many sites across London and are reported on the London Air Quality Network. Between 1997 and 2008 concentrations of key pollutants in London's air have actually reduced, but it is important to note that air quality in parts of London continues to breach EU and national health based targets. **Figure 10.2** below shows where the key targets are exceeded within London and, given the spatial variations shown, highlights the major contribution that transport makes to air pollution in the region.

Figure 10.2 Location of exceedances in air quality standards in London



Key Baseline:

- The rate of recorded crime in London in 2006/07 was the highest of all English regions and Wales at 124 offences per 1,000 head of population. This is based on crimes recorded by the police (Source: Focus on London 2008 - Chapter 11: Crime).
- The rate of robbery in London was more than 3 times higher than average for England and Wales. Vehicle-related thefts were higher in London than in other areas of the country with 1,371 thefts per 10,000 households. This was almost 50% higher than the average for England and Wales (Source: Focus on London 2008 - Chapter 11: Crime).
- In April 2008, there were 18,461 listed buildings, 152 scheduled monuments, 148 registered parks and gardens, 1 historic battlefield, 4 World Heritage Sites and 955 conservation areas in London (Source: Heritage Counts 2008 – London. English Heritage, 2008).
- A third of Londoners now think London is a clean city compared with just 19% five years ago and the numbers of Londoners who think that litter is a problem has almost halved from 43% in 2002 to 23% in 2006 (Source: The Mayor's State of Environment Report for London, 2007).
- Two thirds of London's 1,600 square kilometres are occupied by green space or water. The Green Belt accounts for 22 per cent of London's land and London is unique in designating nearly 10 per cent of its area as Metropolitan Open Land within the built environment (some 107,000 hectares) (Source: The Mayor's State of Environment Report for London, 2007).

London's rivers and canals are also subject to pollution and a number of other pressures including low flows, habitat degradation and recreation. The Environment Agency monitors water quality in England and Wales using its General Quality Assessment scheme. Data shows that the biological and chemical quality of rivers has improved greatly since 1990, which is partly due to a greater focus on pollution prevention. However despite such improvements water quality in London still ranks as the poorest in regional terms across England.

10.1.2 Policies

Chapter 7 contains policies primarily intended to deliver the third and fourth objectives of the draft London Plan which states that London should be:

A city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached, which provide all of its residents, workers, visitors and students – whatever their origin, background, age or status – with opportunities to realise and express their potential and a high quality environment for individuals to enjoy, live together and thrive.

A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London's built heritage and which makes the most of and extends its wealth of open and green spaces and waterways, realising its potential for improving Londoners' health, welfare and development.

The following policies relating to London's living places and spaces are presented within Chapter 7 of the draft replacement London Plan.

Policies in Chapter 7 (Living Places and Spaces)

Policy 7.1 Building London's neighbourhoods and communities	Policy 7.17: Metropolitan Open Land
Policy 7.2: An inclusive environment	Policy 7.18: Protecting local natural space and addressing local deficiency
Policy 7.3: Secured by Design	Policy 7.19: Biodiversity and access to nature
Policy 7.4: Local Character	Policy 7.20: Geological conservation
Policy 7.5: Public Realm	Policy 7.21: Trees and Woodlands
Policy 7.6 Architecture	Policy 7.22: Land for food
Policy 7.7: Location and design of tall and large buildings	Policy 7.23: Burial Space
Policy 7.8: Heritage assets and archaeology	Policy 7.24: Blue Ribbon Network
Policy 7.9: Heritage-led regeneration	Policy 7.25: Increasing the use of the Blue Ribbon Network for passengers and tourism
Policy 7.10: World Heritage Sites	Policy 7.26: Increasing the use of the Blue Ribbon Network for freight transport
Policy 7.11: London View Management Framework	Policy 7.27: Blue Ribbon Network: supporting infrastructure and recreational use
Policy 7.12: Implementing the London View Management Framework	Policy 7.28: Restoration of the Blue Ribbon Network
Policy 7.13: Safety, security and resilience to emergency	Policy 7.29 The River Thames
Policy 7.14: Improving air quality	Policy 7.30 London's canals and other rivers and waterspaces
Policy 7.15: Reducing noise and enhancing soundscapes	
Policy 7.16: Green Belt	

Chapter 7 tackles a number of issues that address the importance of place and space in creating sustainable living spaces in London. They look to ensure that development within London meets high standards, which are inclusive, safe and with low levels of pollution. These policies aim to create healthy environments that will foster inclusive communities and neighbourhoods, particularly in those areas of London which are most deprived. This chapter also seeks to protect and enhance London's green and blue space as an important resource.

10.2 Summary of the effects of Chapter 7 (London's Living Places and Spaces)

Chapter 7 is considered to contribute significantly towards those objectives concerned with land use, biodiversity, health and well-being, equalities, water quality and resources, accessibility and mobility, built and historic environment, liveability and sense of place, open space and air quality.

Many of the policies listed in Chapter 7 will act in synergy with other parts of the plan to have greater positive effects than those identified here. In relation to some objectives, the policies in this chapter are unlikely to have a significant effect for example in relation to employment or the stable economy. Such objectives are addressed

more comprehensively by policies elsewhere within the draft replacement London Plan. Further information is included in **Appendix I**.

10.3 Assessment of Chapter 7 (London's Living Places and Spaces)

1. Regeneration & Land-Use: To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities.

Chapter 7 covers a wide range of topics, which will have a direct effect against the regeneration and land use sustainability objective. Overall it is expected that this chapter will have a significant positive effect on this objective as the majority of the policies contained within it deal directly with improvement of the built realm, community, the environment and land use.

This includes promoting local resident's sense of ownership and community through the promotion of integrated neighbourhoods (Policy 7.1). This policy requires that the design of new developments focuses on ensuring a high level of access to community infrastructure while promoting safety, diversity and a sense of place. Policies 7.2 to 7.6 emphasise the importance of shaping space through development that is sympathetic with the existing form, function and structure of an area.

KEY EFFECTS:

Policies 7.2 to 7.6 will have a significant positive effect against this objective as it promotes development which respects and reflects local character.

Policies 7.8 and 7.9 promote design which incorporates safety and security which will have a direct positive effect against the regeneration objective.

Chapter 7 also contains a number of policies that promote the development of neighbourhoods which are built on inclusive principles. Promotion of an inclusive approach to local area improvements will contribute to a positive feeling about the local area from residents. Similarly a strong focus on designing in security (Policy 7.3) will help to improve the community feelings about an area and will also help to support regeneration.

The protection and enhancement of the heritage resources of an area is a key factor in ensuring that development intended to regenerate the area provides the desired outcomes. Policies 7.8 to 7.11 deal with the protection of historic resources including heritage buildings. It is anticipated that these policies will contribute positively towards the objective through the promotion of sense of place and efficient use of land.

The remaining policies seek to promote the protection of London's open and natural environment and the blue ribbon network. These policies aim to protect robustly the green belt, open land, local natural space, woodlands and London's strategic network of water space. These policies are important in promoting this objective as they will protect and enhance resources that shape the places in which London's residents work and live. They promote the use of brownfield land indirectly through the protection of undeveloped land and which is likely to support regeneration.

2. Biodiversity: To protect, enhance and promote the natural biodiversity of London.

Policies 7.16 through to 7.22 will all have a significant positive effect against this objective as they deal directly with the protecting, enhancing and promoting the natural biodiversity of London (and its green space). Policy 7.19 states that developments should ‘...make a positive contribution to the protection, promotion and management of biodiversity’ and prioritise Biodiversity Action Plan (BAP) species and habitats. Further to this the inclusion of planning decision policy stating that development proposals should be resisted where significant adverse effects are anticipated on the population or conservation status of a protected or priority species will have a positive effect against this objective. It is anticipated that Policy 7.19 will contribute significantly towards the objective.

KEY EFFECTS:

This chapter is anticipated to have a positive effect towards the objective. In particular, Policy 7.19 will have a substantial positive effect against this objective as it outlines measures to protect and enhance biodiversity.

Policies 7.16, 7.17 and 7.18 refer to the level of protection that should be afforded different areas of open space with the Green Belt, Metropolitan Open Land and local natural space all covered. Policy 7.18 also includes detail for LDF development in tackling local deficiencies in local natural space. This is welcomed as it will provide a greater volume of open space which is likely to positively influence local biodiversity.

Policies 7.16, 7.17 and 7.18 refer to the level of protection that should be afforded different areas of open space with the Green Belt, Metropolitan Open Land and local natural space all covered. Policy 7.18 also includes detail for LDF development in tackling local deficiencies in local natural space. This is welcomed as it will provide a greater volume of open space which is likely to positively influence local biodiversity.

In addition to these policies, which deal directly with biodiversity, there are a number of policies which deal with the protection of features such as trees and woodlands (Policy 7.21), land for food (Policy 7.22), burial space (7.23) and London’s Blue Ribbon Network (particularly Policy 7.28 and 7.29). These policies are anticipated to contribute to an overall positive effect towards this objective as they will promote the creation of areas which will be used by nature (e.g. burial area and the Blue Ribbon Network) and also specifically the protection of natural resources (trees and woodlands).

Policy 7.27 specifically refers to biodiversity and proposals aimed at increasing habitat value and refusing developments that reduce habitat value.

The inclusion of references to the potential effects of air quality and noise on protected sites in policies 7.14 and 7.13 is welcomed as they will help to ensure that the most valuable wildlife resources are protected. This is expected to contribute towards the overall positive effect against this objective.

Policy 7.5 ‘Public Realm’ outlines the approach to designing London’s public realm. It includes details which seek greening of the environment wherever possible. The inclusion of reference to greening London’s public realm will contribute to the overall positive effect against this objective.

3. Health and Well-being: To maximise the health and well-being of the population and reduce inequalities in health.

Chapter 7 includes a wide range of policies, which will influence the places where people work, live and visit. There is a long accepted relationship between a person's health status and the broad social and environmental context in which they live⁶.

A detailed Health Impact Assessment was carried out for the chapter (refer to **Appendix B** for more information). Policies

7.1 through to 7.7 seek to improve access to infrastructure, services and transport links. The importance of good design on health occurs on many levels with factors such as density, crime, design quality, flooding and housing quality all influencing mental health. Access to open space and recreational facilities can have a positive community effect on cardiovascular and obesity issues. Tackling poor air quality, both in and out of the home will have a positive effect against reparatory illnesses. Building layout and design can help to tackle mortalities related to extreme temperature while good road layout and design can have a significant effect on road mortality. A number of these issues are addressed directly in Policy 7.1. Policy 7.2 provides further detail on the importance of an inclusive environment to the community. This is particularly important in ensuring that services are available to all members of the community. It is also likely to help tackle the issue of exclusion, which can lead to (and exacerbate) health inequalities.

KEY EFFECTS:

A number of policies have the potential to have a significant positive effect against health and well-being through the use of good design to combat mental health, obesity, cardio-vascular, respiratory and excessive climatic mortalities (hot and cold).

Policy 7.3 concentrates on designing out crime and references the key guidance for designing out crime, which is likely to have a positive effect on health.

A number of the policies set out in the chapter provide guidance on the provision of open space, access to open space and the quality of that open space both for residents and also for wildlife. These policies are likely to have a positive effect against this objective. Increasing the access to, quality of and security of public open space is known to have a positive effect on community health, particularly mental and cardiovascular health⁷. Furthermore, both air quality and noise are known to contribute to adverse health effects so the inclusion of policies 7.14 and 7.15 is expected to have a positive effect against this objective.

Overall the Chapter 7 policies will contribute positively to this objective. Further information is provided in the Health Impact Assessment in **Appendix B**.

⁶ HUDU (2007) Planning for Health Manual. Available online at:
http://www.healthyrbandevelopment.nhs.uk/documents/integrating_health/Planning_for_Health_Manual.pdf

⁷ HUDU (2007) Delivering Healthier Communities in London. Available online at:
http://www.healthyrbandevelopment.nhs.uk/documents/integrating_health/HUDU_Delivering_Healthier_Communities.pdf

4. Equalities: To ensure equitable outcomes for all communities, particularly those most at risk to experience discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London.

A detailed Equalities Impact Assessment was carried out for the chapter (refer to **Appendix C** for more information). Key to tackling inequalities is designing and planning out factors that lead to poor and disadvantaged communities often living in poorer environments. The Equalities Impact Assessment noted that Policy 7.1 (Building London's communities and neighbourhoods) seeks to use the planning process to ensure that new developments have the needs of communities and neighbourhoods at their core. This should contribute positively towards the objective. Policy 7.2, which promotes the creation of an inclusive built environment, will also contribute positively towards this objective by increasing the accessibility of London neighbourhoods to local residents.

KEY EFFECTS:

The Place-shaping policies (7.1-7.7) look to address and design out inequalities in design. There will be significant positive effects as a result against the equalities objective.

The inclusion of Policy 7.3 should help to ensure that new developments accurately and appropriately consider security in their design in order to help design out crime and the perception of crime in local communities. This is likely to make communities more inclusive, particularly to those who may feel at risk or vulnerable to crime (for example, elderly people and women).

The overall effects of this chapter's policies on the equalities objective are likely to be positive. Further information is provided in the Equalities Impact Assessment in **Appendix C**.

5. Housing: To ensure that all Londoners have access to good quality, well-located, affordable housing.

The policies were examined against the objective but no significant effects were identified.

6. Employment: To offer everyone the opportunity for rewarding, well-located and satisfying employment.

The policies were examined against the objective but no significant effects were identified.

7. Stable Economy: To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.

The policies were examined against the objective but no significant effects were identified.

8. Flood Risk and Climate Change Adaptation: To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.

The policies were examined against the objective but no significant effects were identified.

9. Climate Change Mitigation and Energy: To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.

The policies were examined against the objective but no significant effects were identified.

10. Water Quality & Water Resources: To protect and enhance London's waterbodies and the Blue Ribbon Network.

Chapter 7 of the London Plan contains policy guidance on London's Blue Ribbon Network. It is anticipated that there will be significant positive effects towards the objective as a result of policies 7.24 -7.30. These policies, particularly 7.24 will help to meet the objectives of the Water Framework Directive. They will also help to promote and enhance the Blue Ribbon Network - particularly those which promote freight, recreation and tourism uses (policies 7.25-7.27 and 7.30). Policy 7.28 seeks to enhance the Blue Ribbon Network through re-naturalisation, de-culverting and protection against intrusive development.

KEY EFFECTS:

Those policies that explicitly address the Blue Ribbon Network will have a significant positive effect against this objective through the enhancement and promotion of the Blue Ribbon Network.

11. Waste: To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.

The policies were examined against the objective but no significant effects were identified.

12. Accessibility and Mobility: To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).

Policies 7.1 and 7.2 include details on the importance of designing buildings and spaces for all sections of the community including those to whom mobility is an issue. The inclusion of details on designing inclusively for all sections of the community will help to maximise mobility on a neighbourhood level, and also in relation to public transport.

KEY EFFECTS:

The Blue Ribbon Network Policies in particular will ensure that there is a positive effect in the medium to long term against this objective.

The 'London's Blue Ribbon Network' policies (7.24 to 7.30) seek to improve the quality of and access and use of London's waterways for recreational, freight and tourism purposes. The implementation of these policies should see an increased use of the canals and rivers of London which will meet a number of transport targets, through the promotion of an alternative form of transport. It is anticipated that these policies will contribute positively towards the objective.

Overall the chapter will contribute positively to the achievement of this IIA objective. More detailed policies, which directly address other modes of transport, are covered in chapter 6 of the London Plan.

13. Built and Historic Environment: To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces and appropriately designed.

Chapter 7 of the London Plan looks to address the issue of protection and enhancement of the built and historic environment directly through the policies (7.8 to 7.11).

Policy 7.8 (Heritage assets and archaeology) seeks to preserve, refurbish and incorporate historic assets into development, to ensure that the setting of heritage buildings and structures are respected and maintained and that new development makes provisions for the protection of archaeological resources. This policy is anticipated to ensure that the London Plan will have a significant positive effect towards this objective.

Policy 7.9 (Historic conservation-led regeneration) seeks to protect heritage buildings at risk. It is likely that to have a positive effect towards this objective as historic buildings and monuments are important components of local and London's character. The loss of heritage buildings cannot be reversed and as such this policy is anticipated to result in a significant positive effect against IIA objective 13.

Policy 7.10 looks at the protection of London's four world heritage sites. The policy seeks to ensure that each site's 'Outstanding Universal Value' is protected without stifling the ability of London's urban environment to continue to evolve. It is anticipated that the respect for enhancement of the settings and reasons for the sites' designation should result in positive effects against this objective.

Policy 7.11 (London View Management Framework) is a detailed policy which seeks to ensure that those views which contribute greatly to London's character are maintained and enhanced through the planning process. Policy 7.11 includes the identification of strategic views with protected vistas to strategically important landmarks. The policy also sets out the basis for Supplementary Planning Guidance (SPG) to support the principles of this policy.

The inclusion of guidance on the creation of tall and large buildings is welcomed and it is important to realise that iconic London images have always been defined by the ever evolving cityscape, which is influenced by tall and large buildings. It is considered that the inclusion of clear requirements for the design of tall buildings to demonstrate that they will complement the character of the area and are respectful of a number of criteria designed to ensure that they are not harmful to their surroundings, is likely to contribute positively towards the objective.

KEY EFFECTS:

Policies 7.8 through to 7.11 will have a significant positive effect towards this objective as they deal directly with the protection of the historic and built environment.

14. Liveability and Place: To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.

Policies (7.1-7.7) promote the importance of building places for all so that new development reflects the principles of inclusiveness and accessibility, whilst also enhancing the existing character of an area. These policies individually will all have a positive effect against this objective, as they are specifically designed to enhance liveability and sense of place.

The policies that seek to enhance the heritage resources that anchor local character whilst promoting and protecting London wide and local views and vistas, which provide the setting for local communities are likely to have a strong positive effect towards this objective.

Policy 7.13 (Safety, security and resilience to emergency policy) targets the safety and security element of this objective, providing strategic and policy guidance to protect London from emergencies such as fire, flood and terrorism. Combined with Policy 7.3 (secured by design) it addresses those elements that make residents of communities and neighbourhoods feel unsafe in their environments. The effects of these policies is likely to be positive.

The remaining policies in the chapter look to promote and protect open space (7.16-7.23) and London's Blue Ribbon Network (Policies 7.24-7.30). These policies will have a direct effect on the access to open space, which will influence the overall positive effect of the chapter's policies against this objective.

KEY EFFECTS:

The policies (7.1-7.7) are likely to have a significant positive effect against this objective as they seek to address the key issues of creating long-term social cohesion, sustainable lifestyles, security and sense of place through design.

15. Open Space: To protect and enhance natural open space in London.

The policies presented in the chapter seek to protect both strategic open spaces, such as the Green Belt and Metropolitan Open Land but also local natural spaces. Protecting, promoting and enhancing this network of green space will tackle key goals of the open space objective. In addition the quality of open space will be protected through Policy 7.19, which seeks to protect and enhance biodiversity in the Capital. These policies are likely to have a significant positive effect against this objective.

KEY EFFECTS:

A number of policies are likely to have a positive effect against this objective.

Policy 7.28, which seeks to facilitate the restoration of the Blue Ribbon Network will also have a positive effect through opening up new waterways throughout London.

Other policies within Chapter 7 also contribute positively to the open space objective, notably Policy 7.5 which provides guidelines on designing for the public realm. It promotes good practice in designing the public realm at the human scale and, by encouraging 'greening' (including through planting and other soft landscaping), is anticipated to have a positive effect against this objective, particularly in landscape terms.

Restoration of the Blue Ribbon Network, as detailed in Policy 7.28 is anticipated to have a positive effect towards this objective as it seeks to open up new elements of London's waterways.

Overall Chapter 7 is anticipated to have a positive effect against this objective.

16. Air Quality: To improve London's air quality.

Chapter 7 tackles the issues of air pollution in Policy 7.14 (Improving air quality). This policy has a stated aim of ensuring that the implementation of the London Plan results in reductions in pollutant emission and public exposure to pollution. It aligns the plan with the Mayor's Air Quality Strategy and seeks to meet national targets for reductions in the levels of pollutants. This policy alone will mean that there is an overall positive effect against this objective.

KEY EFFECTS:

Policy 7.14 sets out a robust approach to reducing air pollution in line with regional and national standards.

The overall effects of Chapter 7 against this objective are considered to be positive.

11. Assessment of Chapter 8 (Implementation, Monitoring and Review)

11.1 Summary of Policies in Chapter 8 (Implementation, Monitoring and Review)

11.1.1 Context summary

The Annual Monitoring Report is a powerful tool in understanding the impact of policy against the baseline conditions. The Annual Monitoring Report is an important component of the statutory monitoring process in place for the monitoring and review of the London Plan. It reports on a wide range of data sets including key performance indicators. In addition to the Annual Monitoring Report, the Mayor's Annual Report and the four yearly State of the Environment Report provide important data on the implementation of plans and their effects against key targets.

11.1.2 Policies

Chapter 8 sets out the Mayor's approach to implementing London Plan to ensure the delivery of his vision, objectives and detailed policies. The implementation is based on two approaches involving collaboration across London and a Plan-Monitor-Manage technique. The policies set out in the plan help achieve this.

The following policies relating to implementation, monitoring, and review are presented within Chapter 8 of the draft replacement London Plan.

Policies in Chapter 8 (Implementation, Monitoring and Review)	
Policy 8.1: Implementation	Policy 8.3: Community Infrastructure Levy
Policy 8.2: Planning Obligations	Policy 8.4: Monitoring and Review

The policies in Chapter 8 focus on the mechanisms for delivering the policies set out in the previous chapters of the plan. The chapter seeks to identify where both planning obligations and the Community Infrastructure Levy can be sought in relation to developments such that other strategic objectives of the plan can be addressed.

Monitoring and review of the London Plan are important factors in achieving the stated goals of the plan, reacting to change and facilitating implementation. This chapter outlines how the Annual Monitoring Reports and Key Performance Indicators will be used to assess the progress of the plan's policies over the lifetime of the London Plan.

11.2 Summary of the effects of Chapter 8 (Implementation, Monitoring and Review)

The policies of Chapter 8 set out the approach to implementing the London Plan and monitoring delivery. It promotes a collaborative method to ensure suitable locations for strategic development are identified and a positive approach towards new developments is taken. It also outlines the approach to seeking Planning Obligations and Community Infrastructure Levy. Chapter 8 will have a generally neutral or positive effect towards the objectives. Continued monitoring, as set out in Policy 8.4, will help to ensure that any unexpected trends are picked up and can be tackled through policy amendments as required.

Further details on monitoring are set out in **Section 12.2**.

11.3 Assessment of Chapter 8 (Implementation, Monitoring and Review)

1. Regeneration & Land-Use: To stimulate regeneration and urban renaissance that maximises benefits to the most deprived areas and communities.

The policies set out in Chapter 8 are anticipated to contribute positively to the implementation of the London Plan and will help to stimulate urban regeneration and sustainable land use. The policies are expected to ensure that appropriate funding contributions from planning obligations and the Community Infrastructure Levy (CIL) are raised and directed to appropriate strategic schemes, such that the infrastructure projects supporting the wider policies of the London Plan can be met wholly or partly.

KEY EFFECTS:

The chapter contains policies that promote working collaboratively to optimise land use and promote locations for strategic development. As such it is likely to positively contribute towards regeneration, and will help generate ensure that funding is raised to wholly or partly support infrastructure that will benefit deprived communities.

Policy 8.1 particularly emphasises a collaborative approach with boroughs and key stakeholders to ensure effective development and implementation of the CIL. This is likely to have a positive effect.

2. Biodiversity: To protect, enhance and promote the natural biodiversity of London.

The policies set out in Chapter 8 seek to work collaboratively with boroughs and stakeholders to enable and promote strategic development and optimise land use. This is likely to contribute positively to the objective. Inclusion of key performance indicators on loss of designated sites of importance for nature conservation (19), loss of back gardens (10) and open spaces (3) will also have a positive effect.

KEY EFFECTS:

The promotion of a collaborative approach is likely to contribute positively to the objective.

3. Health and Well-being: To maximise the health and well-being of the population and reduce inequalities in health.

The policies within Chapter 8 set out a number of important indicators for monitoring health (also see **Appendix B**). There may be a positive effect towards improvements in health and well-being as planning obligations (Policy 8.2) will be used to ensure that proposed developments contribute towards the suitable provision and capacity of health facilities. This is likely to be particularly relevant in areas of deprivation where regeneration is likely to result in a number of development activities which may help contribute towards increases in the provision of health facilities.

KEY EFFECTS:

The chapter is likely to contribute positively towards reducing health inequalities by ensuring that health inequalities are monitored and that proposed developments contribute through planning obligations (Policy 8.2) to, amongst other issues, adequate health facilities.

Policy 8.4 (monitoring and review) contains a key performance indicator focussed on monitoring health inequalities.

4. Equalities: To ensure equitable outcomes for all communities, particularly those most at risk to experience discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London.

An Equalities Impact Assessment was carried out for the chapter (refer to **Appendix C** for more information). The implementation of the draft replacement London Plan policies through a collaborative approach (with boroughs and relevant stakeholders) is likely to ensure that development and the contributions from planning obligations and the CIL, are directed towards improving equal access to opportunities and reducing social exclusion, poverty or discrimination. In particular, the focus of the CIL (Policy 8.3) to wholly or partly fund infrastructure to support the policies of the London Plan (particularly public transport) is likely to improve the mobility and equality of communities. Similarly Policy 8.2 (Planning obligations) is likely to ensure developments contribute to the provision of adequate social infrastructure to support the diversity of communities in London. The equality of communities' access to employment and social infrastructure is monitored in Annual Monitoring Reports and will enable the London Plan to reflect on progress made. The Equalities Impact Assessment recognises that the funding of housing and transport infrastructure is likely to have a positive effect on equalities, although the funding of less prioritised activities (such as childcare) would also be likely to contribute towards improving equality (further information is available in **Appendix C**).

KEY EFFECTS:

The adoption of a collaborative approach towards implementing the London Plans' policies is likely to ensure that contributions generated from planning obligations and the CIL are likely to be directed to improving the equality of communities to access opportunities across London. This is anticipated to have a positive effect towards the objective.

5. Housing: To ensure that all Londoners have access to good quality, well-located, affordable housing.

The chapter's policies are aimed at ensuring that the London Plan's policies are implemented effectively. A positive approach to enabling new development in London that optimises land use and promotes locations for strategic development is being encouraged. It is envisaged that through this

KEY EFFECTS:

The chapter is anticipated to positively contribute to housing by adopting a positive approach to developments. By working collaboratively, housing is likely to be focussed in areas where it is needed most.

approach, new housing will be focussed in locations where it is needed most, and will help to ensure that all Londoners have access to good quality, well-located and affordable housing. Appropriate annual monitoring is proposed to ensure that progress in relation to the London Plan's objectives and vision with regards to housing is being made, which is also likely to contribute positively to the IIA objective.

6. Employment: To offer everyone the opportunity for rewarding, well-located and satisfying employment.

The chapter's policies concerning the implementation of the London Plan's wider strategic policies are likely to have a positive effect on employment. The positive approach adopted towards new development is likely to provide a number of employment opportunities both directly (as a result of construction) and indirectly (through the provision of adequate space for business use). Planning obligations and CIL are anticipated to help secure funding for strategic infrastructure projects to support the London Plan that in turn are likely to create a number of employment opportunities.

KEY EFFECTS:

A positive approach to the implementation of new developments and the securing of funding (either in part or wholly) for infrastructure projects to support the London Plan's policies are likely to have a positive effect on employment.

7. Stable Economy: To encourage a strong, diverse and stable economy and to improve the resilience of businesses. This should also support the development of an efficient, low carbon economy (including new green technologies) that minimises unsustainable resource use.

The policies in Chapter 8 will support the implementation and monitoring of the wider policies in the London Plan. They also seek to advise how planning obligations and the CIL can be used to secure funding (partially or wholly) for supporting infrastructure projects. It is anticipated that there will therefore be improvements in the accessibility within London through improvements to transport infrastructure and a positive approach towards new development. As such there is likely to be a positive effect towards a stable economy. It is noted that Policy 8.2 (planning obligations) aims for development proposals to address both strategic local priorities. This is likely to have a positive effect through ensuring that businesses are developed in appropriate areas where they will be resilient and stable whilst contributing to a diverse economy. The implementation of the wider policies within the London Plan is also likely to promote an efficient economy that minimises unsustainable resource use.

KEY EFFECTS:

Chapter 8 is likely to contribute positively to the objective by supporting the development of business and the infrastructure required to improve the accessibility within London that will positively support a resilient and stable economy.

8. Flood Risk and Climate Change Adaptation: To ensure London adapts to the effects of climate change (both now and in the future). The effects on London particularly concern flooding, drought and overheating.

The policies set out in the chapter seek to implement the wider strategic policies of the London Plan in a collaborative manner. This will ensure that measures are implemented to adapt to the effects of climate change and minimise flood risk.

KEY EFFECTS:

The policies of implementation, monitoring and review may help to reduce flood risk and promote adaptation to climate change through the wider strategic policies of the London Plan.

9. Climate Change Mitigation and Energy: To ensure London contributes to global climate change mitigation, achieve greater energy efficiency and reduces its reliance on fossil fuels.

The policies set out in the chapter seek to adopt a collaborative approach to the implementation of the London Plan, supported by a framework of monitoring and management. Where planning obligations are applied on new developments, Policy 8.2 (planning obligations) states that when agreeing them importance should be given to tackling climate change. The implementation of the wider policies of the London Plan support the use of public transport and more efficient homes. This is likely to help reduce the consumption of energy and minimise CO₂ emissions. Consequently, it is considered that there is likely to be a positive effect towards the objective.

KEY EFFECTS:

The policies included in the chapter are likely to support the wider implementation of the London Plan's policies. As a number of these wider policies seek to mitigate against climate change, it is anticipated that there will be a positive effect.

10. Water Quality & Water Resources: To protect and enhance London's waterbodies and the Blue Ribbon Network.

The policies in the chapter seek to implement the London Plan, to monitor and review it against relevant key performance indicators and to provide guidance on the application and use of planning obligations and the CIL for new developments. The desire for a collaborative approach to implementing the London Plan indicates that any potential effects on water quality and water resources should be minimised, which is likely to contribute positively to the objective.

KEY EFFECTS:

The promotion of a collaborative approach is likely to contribute positively to the objective.

11. Waste: To minimise the production of waste across all sectors and increase re-use, recycling, remanufacturing and recovery rates.

The policies within the chapter focus on the method of implementing the London Plan. Utilising a collaborative approach is likely to ensure that the effects on waste from the wider strategic policies set out in the plan are considered by relevant stakeholders and measures agreed to minimise any detrimental effects. Planning obligations (Policy 8.2) will be used to ensure that contributions related to the scale of requirements needed by new developments are met.

KEY EFFECTS:

A collaborative approach will help minimise the effects of the London Plan on waste infrastructure.

12. Accessibility and Mobility: To maximise the accessibility for all in and around London and increase the proportion of journeys made by sustainable transport modes (particularly public transport, walking and cycling).

The chapter encourages working collaboratively with boroughs and relevant stakeholders during the implementation of the London Plan. This is likely to ensure that appropriate locations for strategic development are promoted. Importance is given by the policies in the chapter on using contributions secured through planning obligations (Policy 8.2) and the CIL (Policy 8.3) to wholly or partly fund public transport schemes, particularly Crossrail where applicable. The promotion of the use of a voluntary pooling system of contributions is also likely to help ensure that cross boundary schemes are implemented. The Implementation Plan will form part of the monitoring and review process (Policy 8.4) of the replacement London Plan. It will set out the key schemes required for implementation, including improvements to transport infrastructure and accessibility, and is anticipated to help ensure that improvements are made in a timely manner. Monitoring indicators will also ensure that negative trends are identified and addressed at the earliest opportunity. Many indicators relate to monitoring improvements in the use of sustainable modes of transport. It is therefore considered that there will be a positive contribution towards improving accessibility and mobility from the policies within the chapter.

KEY EFFECTS:

A collaborative approach to the implementation of the London Plan is promoted by the chapter. This will help identify suitable locations for strategic development. Importance is given to using contributions secured through planning obligations and the CIL to wholly or partially fund public transport infrastructure schemes that will positively contribute towards the objective.

13. Built and Historic Environment: To enhance and protect the existing built environment (including the architectural distinctiveness, townscape/landscape and archaeological heritage) and landscapes, and ensure new buildings and spaces and appropriately designed.

The policies within the chapter promote a collaborative approach to implementation. This will ensure that boroughs and key stakeholders will be involved to identify and promote locations for strategic development and may help to avoid detrimental effects on the built and historic environment.

KEY EFFECTS:

The chapter promotes a collaborative approach to implementation and will monitor London's heritage and public realm. As such, there may be a positive contribution towards the objective.

Monitoring and review (Policy 8.4) references the key performance indicators used to monitor the implementation of the London Plan. It includes an indicator to protect and improve London's heritage and public realm by monitoring the percentage of buildings at risk of all listed buildings.

14. Liveability and Place: To create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place.

The chapter promotes a collaborative approach to implementation. This may have a positive effect on the objective by ensuring that locations for strategic developments are identified by boroughs and stakeholders. Such developments may help to improve liveability and place through sustainable mixed use developments in some of the most deprived areas of London. Planning obligations and the CIL will be used to secure funding (either partially or wholly) for projects, particularly public transport schemes that are likely to help improve sustainable lifestyles.

The monitoring of the London Plan will ensure that detrimental trends are identified at the earliest opportunity and that measures can be emplaced to address such issues. As such, it is considered that there is likely to be a positive effect towards liveability and sense of place.

KEY EFFECTS:

Implementation the London Plan using a collaborative approach and the use of key performance indicators will help monitor the impact of the Plan. It will enable issues to be addressed as they arise and will help improve the liveability and sense of place. Guidance given for the use of planning obligations and the CIL are also likely to improve the liveability of areas and promote sustainable lifestyles.

15. Open Space: To protect and enhance natural open space in London.

The policies were examined against the objective but no significant effects were identified. However, the monitoring and review of the London Plan may help identify negative trends at an early opportunity, and the inclusion of key performance indicators on loss of designated sites of importance for nature conservation (19), loss of back gardens (10) and open spaces (3) will have a positive effect.

16. Air Quality: To improve London's air quality.

Recognising that the new developments may have effects on air quality, policies in Chapter 8 provide guidance on obtaining contributions through planning obligations and the CIL. Contributions secured this way may be pooled and used to wholly or partially fund improvements to public transport as well as other issues, including tackling climate change. Improvements to public transport and other measures to tackle climate change may help reduce pollution levels and improve air quality. Such issues will be monitored annually to ensure the London Plan's wider policies are being implemented and contributing to air quality improvements. The Implementation Plan will set out the key strategic actions, including improvements in transport that are required by the London Plan. This will ensure that projects happen in a timely manner and can help reduce pollutant emissions within a specified timescale. Consequently, there is likely to be a positive effect towards the objective.

KEY EFFECTS:

The securing of funding for public transport improvements and tackling climate change, amongst other issues, will reduce the emission of pollutants and improve air quality. Annual monitoring will ensure that any detrimental trends are identified at the earliest opportunity and can be measures can be taken to address issues.

12. Conclusions

12.1 Key Findings from the IIA

Overall, the assessment of the draft replacement London Plan has found it to be broadly positive when considered against the sixteen IIA objectives. The draft replacement London Plan also builds upon the positive aspects of the existing Plan. Some of the key strengths of the Plan include:

- A commitment and focus on quality of life – including promoting quality of life in outer London for present and future residents and enhancing local economic opportunities and transport requirements;
- Addressing the concentration of deprivation within inner London and improving the quality of life for those living, working, studying or visiting there;
- Setting out a comprehensive range of policies on climate change mitigation and adaptation (which will help to reduce carbon dioxide emissions, minimise overheating, reduce flood risk, improve water efficiency and enhance green infrastructure);
- Strong support for economic growth that contributes positively to quality of life but without having an unacceptable impact on the environment or encroaching on the Green Belt;
- Strong emphasis on the importance of enterprise and innovation;
- A focus on the protection of heritage, landscape character and strategic views;
- A strong encouragement for people to walk, cycle and to use more sustainable modes of travel - including more widespread use of electric vehicles;
- Greater emphasis on higher quality design of new homes; and
- Building neighbourhoods and communities that are strong, secure, and accessible (for example, with an emphasis on safety and security, planting more trees and enhancing the public realm).

The effects arising from large development projects in London (for example, building more homes) may be positive or negative. These effects may occur as a result of individual developments or cumulatively alongside other developments. The negative effects may include added strain on natural resources (e.g. water resources), pressure to build in areas of high flood risk and an increase in the volume of municipal waste. However, the Plan contains policies to manage and mitigate such effects at the strategic level (e.g. Policy 5.3: Sustainable design and construction; Policy 5.12: Flood Risk Management; and Policy: 5.16 Waste self-sufficiency). Furthermore, localised impacts will also be considered through Local Development Frameworks (LDFs), Area Action Plans (AAPs), Development Briefs and through the Environmental Impact Assessment (EIA) process. Consequently, so far as the London Plan can influence, no significant detrimental effects are anticipated to occur as a result of this draft replacement plan. However, given the level of uncertainty in how some policies will be implemented on the

ground it is important to develop an effective monitoring regime to review the impacts and effectiveness of policy over time (see **Section 12.2**).

Nevertheless, the London Plan - even alongside the Economic Development Strategy and the Mayor's Transport Strategy will not by themselves make London the most sustainable city in the world. To do that still requires Londoners to among other things: walk or ride their bike to work or school⁸, to recycle their own household waste, to make their own homes more energy efficient and to reduce their water usage. Promoting quality of life throughout London will also require a coordinated approach with a number of other agencies, regional, sub-regional and local authorities (as recognised by Policy 2.2 and paragraph 2.13). Their value is in the practical support they give to effecting these real world changes.

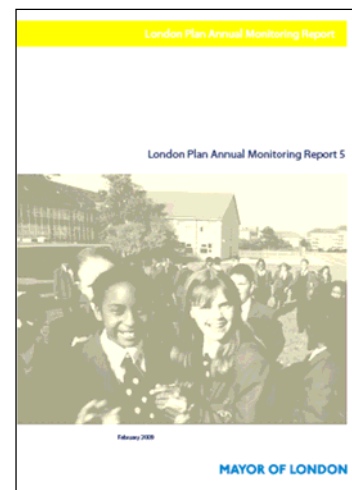
12.2 Monitoring

It is a requirement of the SEA Directive to establish how the significant effects of implementing the London Plan replacement will be monitored. However, as ODPM Guidance⁹ (ODPM, 2005) notes, *'it is not necessary to monitor everything, or monitor an effect indefinitely. Instead, monitoring needs to be focused on significant sustainability effects'*.

Monitoring should therefore be focussed upon significant effects that may give rise to irreversible damage, with a view to identifying trends before such damage is caused (or uncertain effects where monitoring would enable preventative or mitigation measures to be undertaken).

The London Plan recognises *'that in a city as dynamic as London it is impossible to anticipate all the ways in which change will happen... and that it is vital that that we can adjust, especially to changes that could give rise to re-consideration of the Plan's direction or policies...'*. In this way the Plan recognises (and emphasises) the importance of the Plan - Monitor - Manage process (paragraph 8.4).

Existing monitoring measures include the London Development Database, which monitors planning applications, permissions and completions across London for development trends. The database also supports the production of the London Plan Annual Monitoring Report (AMR). The AMR is a key element in the Plan – Monitor- Manage cycle. Previous AMRs have been an important factor in the formation of the replacement London Plan and the Mayor will use future AMRs to monitor the impact of the London Plan and ensure that it is kept up to date and relevant.



⁸ And if they don't have a bike to hire one (see Policy 6.9).

⁹ Practical Guide to the Strategic Environmental Assessment Directive (ODPM, September 2005).

A set of 24 key performance indicators (KPIs) are listed in the draft replacement Plan (Table 8.1), these will be monitored by the AMR, published each February. The KPIs listed in the Plan are identified in **Table 12.1**. Monitoring is also undertaken by the London Sustainable Development Commission (LSDC) which may complement these indicators. The quality of life indicators monitored by the LSDC are also identified in **Table 12.1**. The indicators are grouped alongside the IIA objectives to illustrate their breadth of coverage. These indicators will help monitor the environmental, social and economic effects of the Plan. These measures will be confirmed following consultation on the draft.

Table 12.1 Monitoring Measures

IIA Objective	Monitoring Measure	Source(s) of Information
1. Regeneration & Land-Use	<ul style="list-style-type: none"> The proportion of development taking place on previously developed land Development capacity in the office market Garden land to residential development 	AMR (KPI 1) AMR (KPI 8) AMR (KPI 10)
2. Biodiversity	<ul style="list-style-type: none"> Garden land to residential development Net loss of designated Sites of Importance for Nature Conservation Restore 15km of the river network Bird populations Ecological footprint Access to nature 	AMR (KPI 10) AMR (KPI 19) AMR (KPI 23) LSDC QoL Indicator 14(i) LSDC QoL Indicator 13(i) LSDC QoL Indicator 14(ii)
3. Health and Well-being	<ul style="list-style-type: none"> Life expectancy at birth Provision of childcare places School places to match School Role Projections 	AMR (KPI 6) AMR (KPI 12) AMR (KPI 13)
4. Equalities	<ul style="list-style-type: none"> Employment opportunities for those suffering from disadvantage in the employment market Child poverty Income inequality Fuel poverty 	AMR (KPI 11) LSDC QoL Indicator 8 LSDC QoL Indicator 11 LSDC QoL Indicator 12
5. Housing	<ul style="list-style-type: none"> The density of residential development The supply of new homes The supply of affordable homes Decent housing stock 	AMR (KPI 2) AMR (KPI 4) AMR (KPI 5) LSDC QoL Indicator 21(i)
6. Employment	<ul style="list-style-type: none"> Proportion of working age London residents in employment Employment land available Employment opportunities for those suffering from disadvantage in the employment market 	AMR (KPI 7) AMR (KPI 9) AMR (KPI 11)
7. Stable Economy	<ul style="list-style-type: none"> Development capacity in the office market Number of jobs located in areas with high PTAL values Business survival 	AMR (KPI 8) AMR (KPI 18) LSDC QoL Indicator 19
8. Flood Risk and Climate Change Adaptation	<ul style="list-style-type: none"> Strategic developments achieve zero carbon in residential development / all development Carbon efficiency / carbon emissions 	AMR (KPI 21) LSDC QoL Indicator 23

IIA Objective	Monitoring Measure	Source(s) of Information
9. Climate Change Mitigation and Energy	<ul style="list-style-type: none"> Flooding (number of properties at risk from flooding and households signed up to flood warning system) 	LSDC QoL Indicator 22
	<ul style="list-style-type: none"> Reliance on the private car and a more sustainable modal split for journeys (Use of public transport) 	AMR (KPI 14)
	<ul style="list-style-type: none"> Reliance on the private car and a more sustainable modal split for journeys (Zero traffic growth in central and inner London, and traffic growth in outer London reduced to no more than 5 per cent) 	AMR (KPI 15)
	<ul style="list-style-type: none"> Increase the share of all trips by bicycle 	AMR (KPI 16)
	<ul style="list-style-type: none"> Increase in passengers and freight transported on the Blue Ribbon 	AMR (KPI 16)
	<ul style="list-style-type: none"> Strategic developments achieve zero carbon in residential development / all development 	AMR (KPI 21)
	<ul style="list-style-type: none"> Energy from renewable sources 	AMR (KPI 22)
	<ul style="list-style-type: none"> CO₂ emissions 	LSDC QoL Indicator 13
10. Water Quality & Water Resources	<ul style="list-style-type: none"> Restore 15km of the river network 	AMR (KPI 23)
11. Waste	<ul style="list-style-type: none"> Waste recycled/ composted and sent to land fill 	AMR (KPI 20)
	<ul style="list-style-type: none"> Household recycling 	LSDC QoL Indicator 15
12. Accessibility and Mobility	<ul style="list-style-type: none"> Reliance on the private car and a more sustainable modal split for journeys (Use of public transport) 	AMR (KPI 14)
	<ul style="list-style-type: none"> Reliance on the private car and a more sustainable modal split for journeys (Zero traffic growth in central and inner London, and traffic growth in outer London reduced to no more than 5 per cent) 	AMR (KPI 15)
	<ul style="list-style-type: none"> Increase the share of all trips by bicycle 	AMR (KPI 16)
	<ul style="list-style-type: none"> Increase in passengers and freight transported on the Blue Ribbon 	AMR (KPI 17)
	<ul style="list-style-type: none"> Traffic volumes 	LSDC QoL Indicator 16
	<ul style="list-style-type: none"> Travel to school 	LSDC QoL Indicator 17
13. Built and Historic Environment	<ul style="list-style-type: none"> Proportion of buildings at risk as a percentage of the total number of listed buildings in London 	AMR (KPI 24)
14. Liveability and Place	<ul style="list-style-type: none"> Electoral turnout 	LSDC QoL Indicator 1
	<ul style="list-style-type: none"> Formal volunteering 	LSDC QoL Indicator 2
	<ul style="list-style-type: none"> Number of street crimes reported 	LSDC QoL Indicator 9
	<ul style="list-style-type: none"> Life expectancy 	LSDC QoL Indicator 20
	<ul style="list-style-type: none"> Neighbourhood satisfaction 	LSDC QoL Indicator 10
15. Open Space	<ul style="list-style-type: none"> The loss of open space 	AMR (KPI 3)
16. Air Quality	<ul style="list-style-type: none"> Use of public transport 	AMR (KPI 14)
	<ul style="list-style-type: none"> Reliance on the private car and a more sustainable modal split for journeys (Zero traffic growth in central and inner London, and traffic growth in outer London reduced to no more than 5 per cent) 	AMR (KPI 15)
	<ul style="list-style-type: none"> Increase the share of all trips by bicycle 	AMR (KPI 16)
	<ul style="list-style-type: none"> PM₁₀ emissions 	LSDC QoL Indicator 18

Note: LSDC Quality of Life (QoL) indicators taken from: LSDC (May 2009) *London's Quality of Life Indicators 2008 – 09 Report*.

Quality Assurance

A quality assurance checklist has been prepared and is presented in **Appendix F**, highlighting compliance with the SEA Directive.

Next Steps

This IIA Report is issued for consultation alongside the draft replacement London Plan. Consultation will last for 12 weeks from 12th October 2009 to 12th January 2010. Following receipt of comments on the draft replacement plan and the IIA Report, an Examination in Public (EIP) will be carried out in summer 2010. The EIP will make recommendations to the Mayor in early 2011. Following consideration of these recommendations, the Mayor will inform the Government Office for London that he intends to publish the new replacement London Plan which is anticipated to be adopted before the end of 2011.

During this process amendments may be made to the draft replacement plan and any significant changes will be subsequently reflected in a revised IIA report to support the final replacement plan.

Appendix A

List of Abbreviations

BAME	Black, Asian and Minority Ethnic
CAZ	Central Activities Zone
CIL	Community Infrastructure Levy
CsIA	Community Safety Impact Assessment
EA	Environment Agency
EIA	Environmental Impact Assessment
EqIA	Equalities Impact Assessment
GLA	Greater London Authority
GOL	Government Office for London
HGV	Heavy Goods Vehicle
HRA	Habitats Regulations Assessment
HIA	Health Impact Assessment
IIA	Integrated Impact Assessment
KPI	Key Performance Indicator
LDA	London Development Agency
LDF	Local Development Framework
LFEPA	London Fire and Emergency Planning Authority
LSDC	London Sustainable Development Commission
OLC	Outer London Commission
ONS	Office for National Statistics
PCT	Primary Care Trust
PPS	Planning Policy Statement
PTAL	Public Transport Accessibility Level
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SIL	Strategic Industrial Location
SPG	Supplementary Planning Guidance
TfL	Transport for London

Appendix B

Health Impact Assessment

The Health Impact Assessment was undertaken by Ben Cave Associates and is provided below. The issues raised here are also drawn on within the assessment chapters of this IIA Report (**Section 4 to 11**).

Summary of London's key health challenges

The following are some of London's key health challenges¹⁰:

- London is relatively young with 15 - 44 years olds accounting for 49.5% of the population compared to England average of 41.6%. (ONS, 2007)
- The proportion of people of retirement age is the lowest of all regions (13.8 %) as wealthier people tend to move out of the Capital at retirement age. (ONS, 2007).
- Within London there are wide inequalities in living conditions, and other socio-economic factors that have an influence on health. These inequalities exist between people living in different parts of London, between different ethnic groups, age groups and other groups.
- Ethnically diverse population with high mobility and population growth. The BAME populations are relatively young but are growing fast and ageing. There are large variations in the demographic structure of different ethnic groups.
- London as a whole has slightly below average mortality rates and slightly higher life expectancy than England as a whole, but has above average rates of premature mortality from circulatory disease, and wide inequalities between boroughs/PCTs.
- Key lifestyle issues such as obesity, smoking and alcohol are contributing to poor health in London's more deprived areas: the prevalence of children aged 10-11 at risk of obesity was 80 per cent higher for those living in the most deprived areas of London, compared with those in the least deprived areas.
- London has high rates of teenage pregnancy and sexually transmitted infections such as HIV.
- The incidence of tuberculosis is rising and is more common among ethnic minority groups.
- London has significantly higher than average demand for mental health services, particularly for people with severe mental illness.

¹⁰ From London Health Observatory and NHS London. Health and healthcare in London: key facts. PowerPoint presentation, 2009. www.lho.org.uk and Greater London Authority. Focus on London. London: 2009. www.london.gov.uk/focusonlondon

- Primary care services are performing relatively poorly (Darzi report on London).
- Londoners are more dissatisfied with the NHS, especially those from BAME groups.

The Sustainability Objective for the IIA on health and well-being (Objective 3) states ‘*to maximise the health and well-being of the population and reduce inequalities in health*’. The guide questions are:

- Will it help reduce poverty and the impact of income inequality?
- Will it help reduce health inequalities?
- Will it help improve mental and emotional health?
- Will it improve access to high quality public services (including health facilities)?

Assessment of Chapter 2 (London's Places)

Policy 2.1 locates London as a global sustainable centre for business, innovation, creativity, health, education and research, culture and art and as a place to live, visit and enjoy. Health in this case refers to healthcare and to research carried out at London's universities. Policies 2.2 and 2.3 focus on work that must be conducted across the south east of England. Policy 2.3 states that the Mayor will work with partners in neighbouring regions to develop complementary strategies. It states that the Mayor undertakes to ensure that resources are available for transport and other infrastructure including health, education, open space and other services. The cross-boundary theme is picked up again in Policy 2.5, this time ensuring that sub-regions within London work with each other.

Policy 2.7 is concerned with addressing the constraints on the growth of the economy of outer London: the draft Plan quotes the Outer London Commission's finding that employment grew in outer London at only a quarter to a third the rate of that in either inner London or the adjacent counties. We welcome the attention given to Outer London: health inequalities exist across London and there are pockets of deprivation in each of London's 32 boroughs. For example the London Health Commission programme *Well London* is working in small areas in 20 London boroughs in both outer and inner London: all of the areas are in the most deprived 11% in London.¹¹

The supporting text states that outer London can develop its existing sectors and attract new sectors from parts of the wider south east: there will inevitably be tension between this aspiration and Policy 2.3 emphasising partnership work across the wider south east. Policy 2.8 addresses the transport needs of outer London. The effects of the transport proposals on health and well-being are considered below however we would expect there to be beneficial effects on health and well-being from ensuring that the transport network is integrated and that it provides excellent connections between town centres. Access to public services and healthcare will improve if the public transport network is integrated. The draft Plan includes a map on the Indices of Deprivation (Map 1.1) and a map on the

¹¹ See www.london.gov.uk/welllondon/about/where.jsp

Regeneration Areas (Map 2.5) and makes clear references to addressing social exclusion and tackling spatial concentrations of deprivation (para 2.59): this will contribute to addressing health inequalities. Policies 2.13 and 2.14 are concerned with area-based initiatives and Policy 2.15 covers town centres.

We note the importance of ensuring that the Plan addresses health inequalities between inner and outer London. The draft Plan recognises the challenges that some neighbourhoods in inner London face and the challenges this poses for the Mayor. Policy 2.9 establishes the strategic direction for inner London and Policy 2.10 establishes the priorities for the Central Activities Zone (CAZ). Policy 2.9 recognises that while there has been spectacular economic and demographic growth in inner London there are also concentrations of deprivation and some of the *most challenging environments* in London, socially, environmentally and economically (para 2.35).

Policy 2.18 on green infrastructure notes that it can promote individual and community health and well-being. We also welcome the recognition that green infrastructure is multifunctional: research into the use of urban greenspace shows us that older people, women, young men, children, BAME groups may all use the same space in different ways and that the management of that space needs to reflect this multitude of uses.¹² We note the prevalence of children aged 10-11 at risk of obesity is 80 per cent higher for those living in the most deprived areas of London: opportunities for formal and informal physical activity need to be protected and enhanced or created.¹⁰

There are unlikely to be any other significant positive or negative effects towards the objective other than those identified above.

Assessment of Chapter 3 (London's People (including housing and social infrastructure))

Policy 3.1 states clearly that inequality must be addressed and providing social infrastructure is part of this commitment. We strongly welcome this statement.

In early drafts the Plan did not define social infrastructure: we suggested that this important term should be clearly defined. Social infrastructure is defined in the glossary of the draft replacement plan as:

'Social infrastructure covers facilities such as health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure'.

Table B1 shows the different ways in which the term is used within the draft Plan. Amendments and clarifications were made to these references following comments.

¹² R. Jones, P. Seaman, A. Ellaway, and R. Kendall. It's more than just the park: facilitators and barriers to the use of urban greenspace. Glasgow Centre for Population Health. 2008. www.gcph.co.uk

Table B1: Uses of the term *social infrastructure* within the draft replacement London Plan

Reference	Text
Para 1.38	In addition to this hard infrastructure, a growing and increasingly diverse population will create demand for more social infrastructure, ranging from schools, colleges and universities, theatres, museums and libraries through health facilities to spaces for local groups and places of worship.
Para 2.28	provision of social infrastructure and sustainability of neighbourhoods
Para 2.57	They are key locations for a diverse range of activities, including retail, leisure and office space as well as housing, social infrastructure, public open space.
Para 3.1	supporting social infrastructure provision such as <i>health, education and sport facilities</i>
Para 3.12	It also covers social infrastructure, such as <i>health, education and sport</i>
Para 3.34	social infrastructure provision (see Policy 3.17 - 3.20) with particular attention being paid to access to <i>health, education and other essential services</i>
Para 3.75	Social infrastructure covers a wide range of facilities such as health provision, nurseries, schools, colleges and universities, community, cultural, play, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities and many other uses and activities which contribute to making an area more than just a place to live. At a more local level, facilities additional to those listed above may need to be provided in the public realm, including informal recreation facilities (Policy 3.6), public toilets, drinking water fountains and seating (Policy 7.5).
Para 3.99	<i>Sports and recreation facilities</i> are important parts of the social infrastructure, providing a range of social and health benefits for communities and neighbourhoods.
Policy 7.5 C	New development should incorporate local social infrastructure such as <i>public toilets, drinking water fountains and seating</i>
KPI 12	In addition to this hard infrastructure, a growing and increasingly diverse population will create demand for more social infrastructure, ranging from schools, colleges and universities, cultural and recreation facilities through health facilities to community facilities and places of worship.
KPI 13	<i>School places</i> to match School Role Projections

Policy 3.2 on addressing health inequalities identifies the relevant partners and recognises that many of the causes of health inequalities lie outside the control of the health sector. The policy correctly identifies that action to address health inequalities is required at all geographical levels.¹³ We support the use of Health Impact Assessment stated in clause C: we suggest that the GLA and partners may want to consider quality and standards for HIA when reviewing their Best Practice Guidance note on health to enable commissioners of HIAs to satisfy themselves as to the quality of completed reports.

Furthermore, it was also suggested that Policy 3.2 could include reference to the importance of a stable and diverse economy to reducing health inequalities. The Plan was subsequently revised and now makes reference (in clause e) to '*promoting a strong and diverse economy providing opportunities for all*'.

¹³ See for example M. Whitehead. A typology of actions to tackle social inequalities in health. *J Epidemiol Community Health* 61:473-478, 2007.

Para 3.9 is welcomed and states that *‘housing has a major impact on the health of residents and the policies in this Plan are intended to enable Londoners to live in well designed, high quality homes, appropriately sized and energy efficient, warm and dry, safe, providing good access to high quality social infrastructure, green spaces, and limiting disturbance from noise, or exposure to poor air quality’*.

Policy 3.4 includes *public transport capacity* as one of the criterion for identifying optimum housing potential. Policy 3.5 addresses the quality and design of housing developments. A safe and accessible public realm is important for health and wellbeing: Policy 3.5 includes public, communal and open spaces as a component of housing developments and this point is expanded in para 3.26. The policy also places a welcome priority on the needs of children and older people – this will meet the changing demographic profile of the resident population in London: there will be occasions where the needs of younger or older people in particular population groups needs to be considered for example BAME elders. There is a clear link between Policies 3.5 and 7.2 . Policy 3.6 covers children’s and young people’s play and informal recreation facilities: we support the emphasis on stimulating environments and incorporating trees and greenery.

Gypsies and Traveller communities have poor health and high levels of health inequalities when compared with the wider population. Provision of safe and secure sites is very important as is access to services. Many studies show that excellent communication with and outreach to Gypsy and Traveller communities is essential.¹⁴

Policy 3.9 conflates the needs of Travelling Showpeople with Gypsies and Travellers. We recommend ensuring that the plan differentiates between these groups which have different and distinct needs:¹⁵ Travelling Showpeople may be less economically deprived than Gypsies and Travellers and there are fewer issues with unauthorised sites. Their sites tend to be closer to the network of fairground sites. The Sustainability Appraisal of the North West Regional Spatial Strategy Partial Review notes three additional points with respect to Travelling Showpeople.¹⁵

- Firstly, the yards or plots of Travelling Showpeople sites are not only used for habitation but also for storage. Essentially the sites will need to accommodate living areas that are suitable, in close proximity to heavy goods vehicles (HGVs) and other mechanical plant. This provides some risk to the health of the occupants and thus any policy should ensure the safety and health of the occupants by having stringent design measures to separate these different uses.
- Secondly, but again related to HGVs and plant, there is potential for these sites to cause disturbance in terms of noise, air pollution and visual impacts. There is a potential need for additional guidance on the locational criteria for these sites.

¹⁴ See for example S. Cemlyn, M. Greenfields, S. Burnett, Z. Matthews, and C. Whitwell. Inequalities experienced by Gypsy and Traveller communities: a review. Equality and Human Rights Commission Research Report Series. University of Bristol, Buckinghamshire New University, Friends Families and Travellers for the Equality Human Rights Commission. 2009.

¹⁵ See Sustainability Appraisal Report: Sustainability Appraisal of the North West Regional Spatial Strategy Partial Review. Scott Wilson for the North West Regional Assembly. 2009

- Finally, this use of the sites may create a more difficult situation in regard to promoting co-existence in the area.

Policy 3.10 supports mixed and balanced communities: it supports a more mixed community and emphasises this should be supported where social renting predominates.

We support Policy 3.17 regarding the protection and enhancement of social infrastructure and note the wide definition given to the term. We support Policy 3.18 regarding healthcare facilities and para 3.81 which recognises the role the other plan policies have in addressing inequalities in health.

Policy 3.20 is concerned with ensuring enhancing the provision of sports and recreation facilities and complements Policy 3.6 for smaller and informal play areas.

There are unlikely to be any other significant positive or negative effects towards the objective other than those identified above.

Assessment of Chapter 4 (Economy)

We support the recognition given to the link between health inequalities and economic and population growth (para 4.1). We note that the LSDC will shortly publish research on this topic.

We support the reference to a low carbon economy in the strategic policy for developing London's economy (Policy 4.1). Policy 4.6 is concerned with the provision of arts, culture and entertainment. The plan describes the importance of ensuring that this is *diverse* and offers benefits to *residents, workers and visitors*. This policy requires LDFs to manage the night-time economy: we note that London has lower than national rates of binge-drinking. We note also that development that is predicated on the night-time economy and alcohol and fast-food is highly damaging to public health.¹⁶

Policy 4.8 supports the development of a successful and diverse retail sector. This includes street and farmers' markets. It recognises the importance of being able to walk and cycle to these facilities. The plan recognises that street and farmers' markets can make distinct contributions to meeting Londoners' varied dietary requirements (para 4.46).

We support the strategic direction of Policy 4.12 to improve employment opportunities and low participation in the labour market. The IIA of the London Health Inequalities Strategy notes the potential for a short term increase in

¹⁶ D. Harrison. Alcohol and public health. (*Personal communication*). 2009. Deputy Regional Director of Public Health, Department of Health - North West.

cardiovascular disease (CVD) mortality in London attributable to the current economic downturn.¹⁷ Stuckler *et al* suggest that older people will be more adversely affected.

There are unlikely to be any other significant positive or negative effects towards the objective other than those identified above.

Assessment of Chapter 5 (Response to Climate Change)

Climate change is a major issue and concern for public health.¹⁸ Changes in climate will disproportionately affect vulnerable people in London. Social networks have a protective effect in extreme events: mortality in heatwaves has been shown to be lower in areas with high social capital. This is likely to be due to simple things such as neighbours looking out for each other and especially for vulnerable older people.

The public sector can play an important leadership role in reducing, adapting to, and mitigating the effects of climate change.

Green roofs and urban greening (Policies 5.10 and 5.11) will also have indirect beneficial effects on mental health by providing access to private gardens, providing opportunities to grow food and to improve appearance.

Assessment of Chapter 6 (Transport)

Policy 6.2 refers to improving the safety of the transport network which is likely to help reduce accidents and incidents and improve people's health and well-being whilst using the infrastructure.

Many of the policies within the chapter aim to encourage the use of more sustainable modes of transport, particularly cycling (Policy 6.9) and walking (Policy 6.10). The uptake of these specific modes of travel is likely to contribute positively towards the objective by increasing physical activity and therefore improving the levels of mental and physical health among the population. Increases in cycling and walking can provide substantial improvements in health and well-being and an improvement in health outcomes. In the early stages, and until a critical mass of cyclists is achieved, there will be the potential for more accidents: in this stage the behaviour of all road users, especially private and commercial vehicles, must improve.¹⁹ This will have substantial health and

¹⁷ Stuckler D, Meissner CM, King LP. Can a bank crisis break your heart? *Globalization and Health* 2008;4(1). available at www.globalizationandhealth.com cited in Cave,B. and Iggulden,P. London Health Inequalities Strategy: IIA. Prepared for the Greater London Authority by Ben Cave Associates Ltd.

¹⁸ A. Costello, M. Abbas, A. Allen *et al*. Managing the health effects of climate change. *The Lancet* and University College London Institute for Global Health. vol 373:1693-1733, 2009. www.thelancet.com

¹⁹ See London Councils and London Cycling Campaign. Breaking down barriers to cycling in London. A joint paper, 2008. www.londoncouncils.gov.uk

economic benefits for London: increasing the modal share of cyclists to 5% as proposed in Policy 6.9 could save more than 380 lives due to improved physical activity, and benefit 374,000 people with corresponding economic savings running to billions of pounds sterling²⁰. It is recognised that the policies seek to improve safety for such modes of travel, including Policy 6.9 and, more widely, Policy 6.2.

Policy 6.6 refers to aviation: point A states that *‘adequate airport capacity serving a wide range of destinations is critical to the competitive position of London in a global economy’*. The Mayor states that connectivity by air is one of the contributory factors in London’s competitive position. We suggest that the adequacy of aviation capacity must be judged within the context of existing and potential alternative forms of national and international connectivity to London. Point B strongly opposes further increases in capacity at Heathrow. Point C requires the aviation industry to meet its full environmental and external costs including minimising the impacts of airport servicing and onward freight transport. We suggest that points B, C and D of this policy will contribute to protecting and improving physical and mental health and wellbeing for residents in the vicinity of Heathrow. With regard to air quality the main burden of health effects happens when large populations, for example across London and the South East, experience small incremental changes, at levels that do not necessarily imply breaches of standards. Restricting aviation, as in point E, will assist the London Plan’s contribution to reducing greenhouse gas emissions.

The improvements to public infrastructure outlined are likely to increase the uptake of public transport or other sustainable modes of travel (cycling and walking). Changes which smooth traffic flow (Policy 6.11) and reduce congestion are also likely to have a significant positive effect on reducing air emissions by improving the efficiency of vehicle movements. This will contribute to protecting the health and well-being of London’s population. It will be important to ensure that smoother traffic flow and reduced congestion do not inadvertently make it more dangerous for pedestrians and cyclists and increase social severance. We support the promotion of car clubs in Policy 6.11 as this will reduce the need for car ownership and so reduce the number of cars on the streets: local schemes will need to ensure that car clubs are funded sufficiently over a realistic period of time.

Policy 6.13 places limits on car-parking. We welcome the observation that excessive car-parking provision can undermine cycling, walking and public transport use. We welcome the standards for cycle-parking.

A number of policies are designed to encourage and improve connectivity and enhance public transport capacity are also likely to contribute positively towards the objective by ensuring that a greater number of people across London can visit a range of health facilities throughout London, reducing the inequalities of accessibility.

²⁰ These calculations are preliminary and are based upon the difference in the results achieved between a 5% modal share and a 1% modal share for cycling, using the default settings in the Health Economic Assessment Tool for cycling (HEAT for cycling) available on www.euro.who.int/transport/policy/20081219_1. Current modal share of cycling in London is estimated at 1% equating to 340,000 cycling trips per day.

There are unlikely to be any other significant positive or negative effects towards the objective other than those identified above.

Assessment of Chapter 7 (London's Living Places and Spaces)

Policy 7.1 sets out the strategic direction: the policy states that people should have the best possible access to services, infrastructure and public transport to wider London: we suggest that this will contribute to improved physical and mental health for all Londoners. We support clause G in Policy 7.1: it can be hard to properly engage communities on strategic planning and regeneration issues. This is important and is one the ways in which spatial planning can contribute to social cohesion. Impact assessment can contribute to this process.

We agree with para 7.15 which states that the quality of the public realm has a significant influence on quality of life.

Paragraph 7.26 has been revised following a recommendation to explicitly recognise the multi-cultural aspect of London's history: this will contribute to increasing social cohesion.

Policy 7.13 refers to safety, security and resilience to emergency and has immediate and clear beneficial implications for health and wellbeing. Policies 7.13 and 7.14 refer to air pollution and to noise pollution respectively: this is important to all in the communities affected and is especially important for younger and older people and for the predominantly deprived communities who live in areas of poor air quality and high noise.

Policies 7.16 to 7.19 protect London's open and natural environment: access to green and open space is essential for physical and mental health. If inequalities in health are to be addressed it is important that the spaces are well-managed and that all population groups feel safe and able to access the spaces. These aspects are covered in the CAGE space/Mayor of London BPG on open space strategies that is included in Policy 7.17.

Assessment of Chapter 8 (Implementation, Monitoring and Review)

Policy 8.2 includes health facilities within the scope of planning obligations: the health sector will need continued capacity building to enable it to benefit from this provision. The NHS Healthy Urban Development Unit is an important resource in this respect.

Life expectancy at birth will be collected (see Table 8.1). This is an important indicator. This indicator could be supplemented with indicators that are directly affected by policies in the London Plan. The indicators need to cover physical and mental health. Planning can have a direct effect on the amount of walking and cycling in which people engage.

Maximizing, maintaining and protecting the health of the population is not solely about the provision of, and access to, health services but also about reducing social exclusion, enhancing access to good quality jobs and housing. The Plan contains various objectives which all will have an effect on the health and well-being of the population. This is referred to as the social determinants of health in that health and well being are influenced by

the social, environmental and economic aspects. Policies aimed at reducing social inequalities, such as welfare state and labour market policies have a salutary effect on infant mortality and life expectancy at birth.²¹

²¹ Navarro V, Muntaner C, Borrell C, Benach J, Quiroga A, Rodríguez-Sanz M et al. Politics and health outcomes. *Lancet* 2006(September):1-5 in B. Cave and A. Coutts. Health and wellbeing: health improvement, health services and health inequalities. Ben Cave Associates Ltd for the Greater London Authority and the London Health Commission. Sustainability Appraisal/Strategic Environmental Assessment of the further alterations of the London Plan, 2006. www.londonhealth.gov.uk

Appendix C

Equalities Impact Assessment

Introduction

This equalities impact assessment (EqIA) of the draft London Plan forms part of the Integrated Impact Assessment (IIA) which also includes the Strategic Environmental Assessment, the Sustainability Appraisal, health equality and community safety.

Equalities is one of the key sustainability issues for London, and the Scoping Report for the London Plan identifies as an issue:

“the increasing disparity in quality of life across social groups and the impact of poverty on access to key social, environmental and economic infrastructure (for example housing, transport, health care and education). There is also increasing polarisation of certain socio-economic groups within London.”

The Scoping Report also defines sixteen IIA objectives, of which equalities is one:

“to ensure equitable outcomes for all communities, particularly those most at risk to experience discrimination, poverty and social exclusion. To also promote the cultural, ethnic, faith and racial diversity of London.”

The objectives-led approach enables an assessment of the extent to which each policy in the Plan contributes to each objective. In order to assess how far each policy contributes to the achievement of this objective a set of guide questions is used. These are:

- Will it reduce poverty and social exclusion in those areas and communities most affected?
- Will it promote a culture of equality, fairness and respect for people and the environment?
- Will it promote equality for black and minority ethnic (BAME) communities, women, disabled people, lesbians, gay men, bisexual and trans (LGBT) people, older people, younger people and religious groups?
- Will it benefit the equality target groups listed above?
- Will promote adequate accessibility for those people who are elderly or disabled?

Equality groups

While the equality groups listed in the guide questions are the six strands covered by current anti-discrimination legislation²², we note that the Mayor's recent 'Equal Life Chances for All' equalities framework²³ extends the definition of equalities to include other groups who may face discrimination, disadvantage and social exclusion – for example, due to class or income - whose needs have often been ignored²⁴.

The London Plan rightly addresses all Londoners. The approach taken is designed to bring Londoners together rather than dividing them, but also recognises that deprivation and inequality exists amongst Londoners. The implementation of the London Plan can help to deliver some of the specific outcomes stated in the Mayor's Equality Framework: 'Equal Life Chances for All', for example:

- Engaging in London's excluded communities can inform the planning process
- The Plan contains policies addressing affordable housing and Lifetime Homes
- It contains policies on improving the accessibility and safety of travelling
- It intends to bring long-lasting benefits to local communities through the sustainable legacy of the 2012 Games

The London Plan is a development plan and cannot alone tackle all inequalities. However, many planning policies can help to reduce inequality gaps, both directly and indirectly. This EqIA highlights both positive and negative impacts of the draft Plan's policies.

The EqIA

The following analysis outlines the likely equality impacts of the policies of the draft London Plan. Policies that are likely to have a significant positive or negative impact on equality groups have been analysed.

Chapter 1: Context and strategy

This introductory chapter sets the context for London and gives projections for London's changing population, pointing out that there will be a higher proportion of young people than elsewhere in the country. A projected increase in the older population is likely to mean a higher proportion of disabled people and people with particular

²² Discrimination on the grounds of age, disability, gender, gender reassignment, race, religion or belief, and sexual orientation is currently outlawed.

²³ <http://www.london.gov.uk/mayor/equalities/framework/>

²⁴ The links from the following webpage give examples of these other groups <http://www.london.gov.uk/eqiaguide/target.jsp>

mobility and access needs. The capital will also be an ethnically diverse city with six London boroughs (Harrow, Redbridge, Tower Hamlets, Ealing, Hounslow and Croydon) likely to have more than 50% of its population from BAME groups, joining Brent and Newham which already have more than half their population from BAME groups. The chapter also indicates that the economy is likely to recover from the current downturn and that the number of jobs is likely to increase. It goes on to point out the persistent problems of poverty and disadvantage and how certain equality groups are likely to experience higher levels of poverty and unemployment. These problems tend to be geographically concentrated, particularly in inner north east London, and across the whole of east London on both sides of the Thames, as well as a cluster of deprived areas around Park Royal in west London.

The changing demography and spatial concentrations of poverty are important considerations in spatial planning policy and in this paper we will be examining how well the detailed London Plan policies address these issues.

The chapter lays out six objectives for London and Objectives 1, 3 and 6 in particular will impact positively on equality groups, once they are realised.

Chapter 2: London's Places

This chapter of the draft London Plan sets out policies for managing the challenges of economic and population growth in a way that will ensure that quality of life is improved and inequality amongst Londoners is tackled. Policies which designate London's distinctive places (growth, opportunity, intensification and regeneration areas, town centres, industrial locations and open spaces) could have either a positive or negative impact on equality groups and poor communities, depending on their location and on how they are implemented (for example, if they are in areas of deprivation they should have a positive impact). Part of the monitoring process of the London Plan should therefore collect information on the impact on equality groups of the designation of these areas. More detailed comments on the impact of individual policies follow.

Designation of growth areas and opportunity areas (2.3 & 2.13)

These policies could impact positively on adjacent poorer neighbourhoods if the opportunities, particularly from employment growth, are made available to residents in adjacent areas.

The 2012 Games and their legacy (2.4)

The legacy of sports facilities, and affordable housing should impact positively on those living in east London, mainly poorer communities. The intention to ensure that the sports facilities are both accessible and affordable should impact positively on equality groups.

Outer London (2.6 and 2.7)

The Plan seeks to address the constraints on the economic growth of outer London by policies designed to enhance employment opportunities for residents. Policies 2.7 f and h mention higher density housing. Higher densities may mean high rise development and/or a lower ratio of open space within housing areas which may be unsuitable for

larger households with children. It is important therefore that overall housing requirements for larger households is met within each borough.

Outer London (2.8)

The policy to support reverse commuting could impact positively on poorer communities who may have better access to new job opportunities.

Central Activities Zone (CAZ) (2.10)

The policy at g mentions how Opportunity and Intensification Areas should benefit local communities as well as providing high quality, strategic development capacity, and this should impact positively on inner city residents.

Central Activities Zone (2.12)

The policy at b mentions that the Mayor will work with social infrastructure providers to meet the needs of local residents, visitors and workers. This could impact positively on equality groups if social infrastructure providers work explicitly to meet their needs.

Opportunity Areas and Intensification Areas (2.13)

The Opportunity and Intensification Areas are set out in Annex 1 and include guidance for a minimum number of new homes as well as an indicative employment capacity. The use of brownfield sites to build new homes and provide new jobs could impact positively on current and potential residents, of whom many will come from equality groups. However, where there is intensification through redevelopment it is important to consider the impact on housing availability for larger households according to current and future need.

Areas for Regeneration (2.14)

The focus on regeneration areas should have a positive impact on many equality groups since these are poorer areas where many disadvantaged and discriminated against people live. The reference made to spatial policies which aim to integrate regeneration, development and transport proposals with improvements in learning and skills, health, safety, access, employment, environment and housing is welcomed as it should impact positively on equality groups if such improvements target these groups.

Town centres (2.15)

Many of the planning decisions policies relating to town centres should have a positive impact on equality groups through planning local neighbourhoods which foster a sense of place and a local identity. Retaining the diversity of retail shops will be important as many small independent shops are BAME owned. The promotion of Shopmobility schemes will have a positive impact on older and disabled residents. While it is recognised that the

intensification of residential development may be appropriate in town centres, implementation should consider any reduction in the availability of larger households units, according to current and future need.

Strategic outer London development centres (2.16)

This policy aims to identify, promote and develop centres in outer London which have a strategic economic function that is greater than sub regional importance. New employment opportunities could have a positive impact on unemployed people and also existing BAME residents living in such areas (e.g. Brent, Hounslow, Croydon, Stratford and the upper Lee Valley).

Strategic industrial locations (2.17)

The policy B (c and d), which will allow development to meet the needs of small and medium sized enterprises (SMEs) and services for industrial occupiers should have a positive impact on some equality groups, for example promoting employment space for SMEs (BAME owned businesses tend to be SMEs) and making provision for workplace crèches.

The network of open and natural spaces (2.18)

Such a network should have a positive impact on the health of Londoners and could have a positive impact on equality groups provided that the network is targeted at them and made accessible in the widest sense, for example ensuring that it is fully accessible for people with mobility problems or there is adequate signage for alternative routes.

Chapter 3: London's People

This chapter focuses on housing for all Londoners and has policies to promote affordable housing as well as policies specifically targeting some equality groups, such as gypsies and travellers. It also focuses on the need to plan for social and community infrastructure with an emphasis on meeting the diverse needs of Londoners. It suggests that boroughs should make appropriate and accessible provision for particular groups and communities, including religious groups. The policies should therefore have a positive impact on particular groups.

Ensuring equal life chances for all (3.1)

This over-arching policy emphasises the need to provide social infrastructure that can help to tackle inequality across London, and suggests in its LDF policy that boroughs may wish to identify clusters of disadvantaged and socially excluded groups and consider whether the provision of community facilities or places of worship is appropriate. If boroughs undertake analysis and consultation around the need for such facilities, and make provision where need is identified, this will have a positive impact on those groups. The supporting text (paragraph 3.4) talks about the need to help groups or communities to find common ground on which they can work together to create a common vision build on bonds that unite rather than the differences that separate. While we welcome this statement we also believe that there should be some mention of the need to listen to the specific needs of

particular groups, otherwise the aim of providing equal life chances to all will be difficult to meet. We note that paragraph 3.5 mentions the importance of addressing the needs of all in society, including religious groups, and feel that there should be some reference to where needs might be different for different groups e.g. LGBT people may have specific housing, community and health needs. The Statement of Community Involvement and the Duty to Involve provides boroughs with an opportunity to consult and involve equality groups around the planning of community facilities and could be mentioned in the supporting text.

Addressing health inequalities (3.2)

The policy emphasises the need for a health inequalities impact to be undertaken for major planning applications. The supporting paragraphs also make reference to the link between the physical environment, employment, housing and health. Improving the physical environment, air quality, employment opportunities, decent and affordable housing are all matters for the London Plan, and policies that aim to improve these will impact positively on disadvantaged and socially excluded people. There is also a mention that the voluntary and community sectors can play a part in tackling health inequalities, particularly in promoting and supporting community involvement.

Increasing housing supply (3.3)

The policy states that the Mayor will seek to increase housing provision by a specific target. Building new homes is necessary to meet the predicted growth in population, and the policies relating to intensification and opportunity areas, town centres and renewal of existing residential areas will all help to meet this demand. This could have a positive impact on equality groups who obviously form a significant part of London's new population growth. Policies in this chapter also make reference to mixed and balanced communities, affordable housing, Lifetime Homes etc. which should meet the needs of poorer communities and equality groups.

Optimising housing potential (3.4)

The policy makes explicit reference to a housing density matrix giving a range of densities appropriate to suburban, urban and central locations as well as public transport accessibility. The matrix is in place to ensure that mix of densities is provided to accommodate both smaller and larger households and so should accommodate all groups. It states that development proposals that contravene the appropriate range should normally be refused which is particularly important to ensure that overcrowding does not occur.

Quality and design of housing developments (3.5)

The LDF and planning decisions policy makes reference to housing design and the residential environment, explicitly referring to the provision of public, communal and open spaces which should take account of the needs of children and older people. The supporting paragraphs also make reference to extending the principles of Lifetime Homes to the neighbourhood level, thus creating Lifetime Neighbourhoods. These should have positive impact on equality groups, especially younger and older people and disabled people.

Play and informal recreation (3.6)

This policy, which should ensure that adequate play and informal recreation space is provided for within new developments, will have a positive impact on households with children. The policy explicitly refers to the SPG which sets out specific guidance, including the appropriate ratio of space to child population.

Large residential developments (3.7)

This policy takes care to emphasise the necessity of a planning framework which will coordinate the provision of social, environmental and other infrastructure. It also emphasises the importance of local consultation with communities and other stakeholders. If the consultation includes equality groups this should not have a negative impact on particular groups.

Housing choice (3.8)

The policy refers to the housing requirements of different groups rather than just affordability and high quality environment. The LDF policies are more explicit and mention, not only choice and affordability, but also the need to provide Lifetime Homes, wheelchair accessible homes, supported housing etc. This should have a positive impact on those households with children, vulnerable people, disabled people, older people, and poorer people.

Gypsies and travellers (3.9)

This policy refers to the need to provide pitches for gypsies and travellers, including pitches for travelling showpeople. While the Mayor has identified the number of pitches required for each Borough, in consultation with the London Gypsy and Traveller Forum and other representatives of traveller communities, the supporting paragraph 3.45 implies that it will be difficult to meet the need because of the limited supply and cost of land in London. However, it is recognised that the supporting information is not available at the moment and the policy needs more work, and tables and figures need to be inserted and justified. We also feel that the needs of travelling showpeople are different than those for gypsies and travellers (see **Appendix B**: the Health Impact Assessment) and that the policy should differentiate between these groups.

The supporting text mentions future guidance from the Mayor on implementing this policy which will not only include sources of pitch provision but also social and other infrastructure and measures to foster greater social inclusion, guidance which should help to meet the social and health needs of gypsies, travellers and travelling showpeople.

Mixed and balanced communities (3.10)

This policy to promote mixed and balanced communities is designed to avoid future concentrations of deprivation and worklessness. It should be noted that socially and economically excluded people living in such balanced communities will have more need of social infrastructure such as training resource centres and community facilities than those living in the owner occupied sector.

Affordable housing (3.11 and 3.12)

These policies define affordable housing to include both social rented housing and intermediate housing. Policy 3.12 states that a target of 13,200 more affordable homes per year be provided, 60% of which should be for social housing and 40% for intermediate housing. This figure is lower than the figure of 18,200 mentioned in the London SHMA because the Plan states that funding in the current recession may be an issue. This would imply that not all affordable housing needs will be met, which will impact negatively on poorer communities in need of social housing, a fact that is acknowledged in the supporting text.

Affordable housing on individual schemes (3.13 and 3.14)

Policy 3.13 looks at how boroughs influence developers to provide affordable housing. Encouraging developers to provide affordable housing, including a mix of social and intermediate housing, will be essential in reaching the targets set in Policy 3.12 and thus meeting the housing needs of poorer and vulnerable people.

Existing housing (3.15)

This policy is in place to ensure that the existing housing stock is maintained and enhanced. It makes special mention that loss of housing, including affordable housing – and in particular loss of hostels, staff accommodation and shared accommodation – should be resisted unless the equivalent space is replaced. This should impact positively on vulnerable people living in hostels and shared accommodation.

Coordination of Housing Development and Investment (3.16)

The policy encourages boroughs, in devising their LDFs, to coordinate with relevant London-wide agencies, strategies and policies as well as their own social and housing strategies which should hopefully ensure that social housing is provided for.

Social infrastructure (paragraph 3.17)

This policy will support the provision of social infrastructure which should impact positively on poorer communities and on equality groups. We welcome the idea of a criteria-based approach to the provision of social infrastructure and would wish to clarify that access does not merely mean physical access, but also access that is welcoming and attractive to all Londoners.

Healthcare facilities (3.18)

We welcome the statement in paragraph 3.16 which makes the link between poor health, poor housing and unemployment.

Education facilities (3.19)

Co-location of education and community facilities should have a positive impact on equality groups. The provision of community learning facilities will have a positive impact on adults who may not have benefited from education while at school.

Sports facilities (3.20)

While this policy should have a positive impact on equality groups and we welcome the specific reference to disabled people, we feel that the policy, or supporting text, should also make reference to other groups e.g. women and religious groups who may need specific targeting in order to use facilities.

Chapter 4: London's Economy

The chapter specifically mentions that policies will aim to tackle employment inequalities amongst Londoners but does not specifically pinpoint how this will be done through this set of policies. Policies, including transport policies, that aim to connect areas of employment growth and opportunity with deprived neighbourhoods should be supported by initiatives (perhaps through the Mayor's Economic Development Strategy) that also encourage people living in deprived areas to seek jobs outside their area. The impact of policies in this chapter are assessed if they are likely to have a significant positive or negative impact on equality groups or those living in deprived neighbourhoods.

Offices and industrial land (4.2 to 4.4)

The policies for locating office and industrial development, and for converting surplus office development, are driven to a major extent by demand and therefore it is difficult to assess the impact on equality groups. Furthermore, the accessibility of employment opportunities to equality groups and poorer communities is not only driven by nearby availability, but by training and other activities that reduce the barriers to employment for such groups. These sorts of activities are rightly the subject of the Mayor's Economic Development Strategy.

Provision of arts, culture and entertainment (4.6)

The planning decisions policies mention accessibility for all sections of the community, including disabled and older people. The provision of a cultural focus to foster more sustainable local communities is also mentioned. These policies should result in a positive impact on equality groups and encourage a diversity of culture. While we appreciate that the night-time economy should be managed sustainably so that they do not impact on the quality of life for local residents, it is likely that noise and nuisance from night time entertainment may affect inner city neighbourhoods where a high proportion of poorer communities live.

Supporting a diverse retail sector and small shops (4.8 and 4.9)

The encouragement of specialist and convenience shopping neighbourhood areas should have a positive impact on those customers who are less mobile as well as BAME customers who may have better access to cheaper and more varied fresh food than might be available in supermarkets. The policies might also have a positive impact on

BAME owned retail business owners who are likely to own and work in such shops. The reference to the provision of accessible local shops and devising local retail strategies (paragraphs 4.48 and 4.49) are particularly important in this respect. The use of s106 to encourage the provision of affordable shop units could also have a similarly positive impact.

Improving opportunities for all (4.13)

This policy emphasises the need to work with strategic partners, such as the LDA and the London Skills and Employment Board, to provide the spatial context to coordinate the range of initiatives to improve employment opportunities for all Londoners. The supporting paragraphs give good information about barriers to employment faced by equality groups. Paragraph 4.63 refers to the importance of providing employment opportunities close to those communities in need of local jobs and also gives a list of ways to tackle the barriers that equality groups face in finding employment, which if implemented will have a positive impact on these groups. Paragraph 4.64 encourages boroughs to investigate with developers the possibility of providing local businesses and residents the opportunity to apply for employment opportunities in the construction and subsequent use of new development, which, when implemented in regeneration areas, will have a positive impact on the employment opportunities for deprived communities.

Chapter 5: Climate Change

This chapter sets out policies to tackle climate change including measures to mitigate climate change as well as to adapt to it. Policies which aim to reduce energy and water use, or produce cheaper energy and water, will have a positive impact on deprived communities.

Sustainable design and construction (5.3)

Policies that increase energy efficiency will also reduce energy bills and thus will have a positive economic impact on those households living in new developments.

Retrofitting (5.4)

This policy aims to reduce the environmental impact of existing building stock. This should have a positive impact on those living in refurbished housing stock as there should be a reduction in energy usage and bills. Paragraph 5.29 refers to the opportunities for retrofitting arising from major estate refurbishments.

Decentralised energy networks (5.5)

This policy to generate 25% of heat and power used in London through decentralised energy networks will have a positive impact on equality groups and poorer communities if they result in more efficient use of energy and lower energy costs. This impact, however, depends on the location of such networks, although we understand that areas that accommodate decentralised energy networks best are primarily in inner London where many of the deprived areas are located.

Waste capacity (5.18)

This policy emphasises the need for more waste processing capacity in London. Noise and nuisance from waste management sites may have a negative impact for any adjacent residential sites. Furthermore new sites may require relocation of residential and businesses. There will be a need at the local level to assess the equality impact of large new waste management sites.

Chapter 6: Transport

Improvements to the connectivity and accessibility of public transport will have a positive impact on residents, commuters and tourists, but some people may benefit more from particular improvements. Transport improvements can positively affect people from deprived neighbourhoods by improving links between these areas and areas of employment opportunities. In planning improvements there should therefore be detailed analysis of the effect on particular groups, taking into account their location, patterns of movement, usual transport modes and needs. The need for full accessibility for disabled people needs to be taken into account where improvements are made.

Transport connectivity (including Crossrail) (6.4 and 6.5)

Improvements to the public transport system in London should have a positive impact on equality groups, especially if they link deprived neighbourhoods with areas of employment opportunity. However, Londoners will benefit to a greater or lesser degree, depending on the location of the route being improved and their use of it, and therefore it is difficult to say with certainty how equality groups will benefit, compared the rest of the population. A full EqIA for any major new or improvements developments (such as Crossrail) should be conducted. This should include an accessibility analysis for new services that examines how far equality groups will benefit, compared to the average impact throughout London.

Buses, bus transits, trams (6.7)

This policy that will work to improve the quality of bus, bus transits and tram services should impact positively on young people, older people and women as they are frequent users of the buses. The implementation of TfL's accessible bus stop design guidance should make access to buses easier for disabled people. The policy does not mention security on buses or access for disabled people, but this would be contained in the Mayor's Transport Strategy.

Walking (6.10)

Policies that encourage walking for pedestrians, and which improve the walking experience, should have a positive impact on children and young people, women and older people who are more likely to be pedestrians. The increase in safe and secure walking routes should also have a positive impact on those who suffer harassment in the streets, such as LGBT and BAME people. Improvements in access to walking for disabled people should impact positively

on them. However, encouraging the shared pedestrian use of road space is likely to have a negative impact on blind and partially sighted people and wheelchair users.

Chapter 7: Living Places and Spaces

The chapter's focus is on building London's neighbourhoods and communities and on its buildings and open spaces. Policies on integrated and inclusive neighbourhoods should all have a positive impact on equality groups, if implemented.

Building London's neighbourhoods and communities (7.1)

This policy emphasises the importance of building neighbourhoods so that all people have the best possible access to services, infrastructure, and public transport to wider London. The emphasis is on planning new developments that will improve people's access to community infrastructure, commercial services and public transport. It also emphasises the need for new development to meet the Lifetime Neighbourhoods criteria. The Lifetime Neighbourhoods concept will impact positively on some equality groups, particularly older people and disabled people. The LDF policy to boroughs on working with local communities to identify their expectations for their neighbourhoods, and to develop strategies for achieving them, should impact positively on equality groups. It is important that they are included in consultation and preparation of such strategies.

Inclusive environment (7.2)

This policy emphasises the importance of accessible and inclusive design which will ensure that new development can be used safely, easily and with dignity by all, regardless of disability, age, gender, ethnicity or economic circumstances, are convenient and welcoming, flexible and responsive, and realistic. This policy should have a positive impact on the equality groups mentioned but it does not refer to LGTB and religious groups. It is therefore important to mention that boroughs should be encouraged to include specific equality groups in consultations at the design stage.

Secured by design (7.3)

The policy focuses on safety, security and accessible environments where crime and fear of crime do not undermine quality of life or community cohesion. This should impact positively on particular groups that are vulnerable to crime, including older and disabled people, women, LGBT and BAME people, and religious people.

Public realm (7.5)

This policy states that new development should incorporate social infrastructure such as public toilets, drinking water fountains and seating into the public realm. This will have a positive impact on frequent users of the public realm, including younger and older people, women with children.

Tall and large buildings (7.7)

The policy on tall buildings mentions that they should contribute to regeneration. This could have a positive impact on those living in deprived neighbourhoods if there is some positive connection between those neighbourhoods and the tall buildings.

Air quality and noise reduction (7.14 and 7.15)

Policies to improve air quality and to reduce noise will have a positive or negative impact on equality groups depending on the spatial patterns of areas with improved air quality or noise reduction.

Metropolitan Open Land and natural space (7.17 and 7.18)

Policies to promote open space should impact positively on people's health. The impact on equality groups will be beneficial if they are encouraged to use such space and if it is accessible.

Burial spaces (7.23)

The policy intends to protect existing burial spaces and to promote new provision. This will have a positive impact on people who require burial, for example Muslim people.

Chapter 8: Implementation, Monitoring and Review

This chapter sets out how the implementation of the London Plan will be monitored and should be the means to test how far the policies have impacted positively or negatively on equality groups and people living in deprived neighbourhoods. We would welcome a system that specifically focuses on some of the impacts mentioned in this assessment.

The chapter also sets out guidance for planning obligations under Section 106 as well as the Community Infrastructure Levy.

Planning obligations (8.2)

The policy sets out strategic priorities for planning obligations and also requires boroughs to set out a clear framework for negotiations on planning obligations. Some planning obligations could have a highly positive impact on equality groups. The funding of local infrastructure such as childcare provision, small shops and health has a lower priority than affordable housing and transport in the Mayor's priorities for planning obligations for strategic applications. While the funding of affordable housing and transport will have a positive impact on equality groups, childcare provision, small shops (of which a high proportion are BAME owned) and health inequalities are also of significant and direct benefit for equality groups.

Community Infrastructure Levy (8.3)

The Community Infrastructure Levy (CIL) may substantially replace section 106 agreements and the Mayor intends to prepare guidance for boroughs and other partners setting out a clear framework for its application. This will be subject to an Equalities Impact Assessment.

Monitoring and review (8.4)

Monitoring the implementation of the London Plan is extremely important since it is only at its implementation stage that the full equalities impact can be seen. Table 8.1 includes key performance indicators (KPIs) that will be monitored annually, some of which relate directly to equality targets, such as affordable homes, health and employment inequalities. An annual Equalities Report will be published which will consider the actual impact of the London Plan's policies. It will be important that this Report monitors the impact of the policies mentioned in this EqIA.

Appendix D

Community Safety Impact Assessment

The Community Safety Impact Assessment was undertaken by Entec and is provided below. The issues raised here are also drawn on within the assessment chapters of this IIA Report (**Section 4 to 11**).

Summary of London's key safety and security statistics

The following are some of London's key statistics relating to community safety²⁵:

- The number of total crimes recorded in London fell by 1.6% (from August 2008 to August 2009)
- The total number of burglaries rose by 3.2% (from August 2008 and August 2009)
- Motor vehicle theft fell 9.3% from 115,309 in the 12 months to August 2008 to 104,561 in the 12 months to August 2009
- Homicides are down by nearly 25% over the same period
- Knife crime has been reduced by nearly 12%
- Youth violence is down by nearly 10%
- In 2008/09, 34,378 offences of street crime were recorded. This is a decrease of 39% since 2003/04. In total there were 844,245 crimes recorded by the Metropolitan Police during 2008/09, the lowest since comparable records started in 1998/99. Since 2003/04, overall recorded crime has reduced by 20% (or 216,685 fewer offences)².

There are two main IIA Objectives that reflect Community Safety.

Objective 12 (Liveability and Place) '*to create sustainable, mixed use environments that promote long-term social cohesion, sustainable lifestyles, safety and security, and a sense of place*'. The guide questions are:

- Will it help reduce actual levels of crime and antisocial behaviour?
- Will it help reduce the perception of crime in an area?
- Will it help reduce the risk of terrorist attack?

²⁵ Metropolitan Police, Crime Figures for London, 2008 <http://www.met.police.uk/crimefigures/>

- Will it reduce road traffic accidents?

Objective 8 (Flood Risk and Climate Change Adaptation) ‘*to ensure London adapts to the effects of climate change (both now and in the future)*’. The guide questions are:

- Will it manage existing flood risks appropriately and avoid new flood risks?
- Will it protect London from climate change impacts?
- Will it minimise the risk of flooding from rivers and watercourses to people and property?

Assessment of Chapter 2 (London's Places)

Policy 2.14 is concerned with the regeneration of key areas within London and suggests that Boroughs in their LDFs, Community Strategies, Local and Multi-Area Agreements should identify areas for regeneration and set out policies which bring together regeneration development with improvements in areas such as safety, access and housing and the environment.

Areas identified for regeneration are often those that are most deprived and have high levels of crime. Ensuring that these regenerated areas consider the issue of safety in their design is likely to result in a positive effect on community safety.

Policy 2.15 on Town Centres encourages Borough's to promote 'safety, security and lifetime neighbourhoods'. The policy also encourages the support of Business Improvement Districts which promote safety, security and environmental quality. The effects of the policy on community safety are likely to be beneficial as the promotion of safe and secure built environments will help reduce the fear of crime and antisocial behaviour.

There are unlikely to be any other significant effects towards the objective other than those identified above.

Assessment of Chapter 3 (London's People)

Policy 3.2 on addressing health inequalities aims to promote London as a healthier place for all by promoting the effective management of places that are safe, accessible and encourage social cohesion. The supporting text states that '*in his health inequalities strategy the Mayor will promote initiatives to create healthier and safer environments for all Londoners both in new and existing neighbourhoods*'.

Policy 3.5 relates to the quality and design of housing developments. Policy 3.6 on children's play and informal recreation facilities states that '*the Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision incorporating trees and greenery wherever possible*'.

According to the London Sustainable Development Commission's Report², since 2007, there has been a significant increase in teenage homicide, which often involves knives and occasionally firearms. By designing safe play and

recreational facilities, Policy 3.6 is likely to help to reduce the amount of crimes committed against young people and will therefore have a positive effect on community safety.

Policy 3.7 relates to large residential developments with the supporting text noting consideration should be given securing and maintaining a high quality public realm, safety measures, planting and open space and play provision.

We support Policy 3.17 regarding the protection and enhancement of social infrastructure and note the wide definition given to the term. All facilities are encouraged to be safe and user-friendly. Policy 3.19 is concerned with education facilities and ensuring they are adequate, safe and accessible to all.

There are unlikely to be any other significant effects towards the objective other than those identified above.

Assessment of Chapter 4 (Economy)

Policy 4.2 relates to offices and suggests that DPDs enhance the environment and offer London's office locations in terms of physical attractiveness, amenities and supporting activities as well as services accessibility, safety and security.

Policy 4.7 is concerned with developing retail and town centre development. Paragraph 4.41 is welcomed and states '*development of edge-of-centre locations should be well integrated with the town centre, particularly in terms of providing safe, convenient and attractive access by walking and cycling*'.

City centres and edge-of-centre developments are often areas where antisocial behaviour and crimes take place, particularly during evenings. The policies will have a positive effect upon the objective by ensuring that the various developments and areas are safe and secure for local users at all times.

There are unlikely to be any other significant effects towards the objective other than those identified above.

Assessment of Chapter 5 (Response to Climate Change)

Climate change increases the risk of flooding which could significantly impact upon the safety of local communities.

By ensuring that new and existing developments do not increase the risk of flooding or are designed to be flood resilient and safe to evacuate (Policy 5.12) is likely to have a positive effect on community safety.

There are unlikely to be any other significant effects towards the objective other than those identified above.

Assessment of Chapter 6 (Transport)

Policy 6.2 refers to improving the reliability and safety of the transport network and states that *‘the Mayor will work with strategic partners to coordinate measures to ensure that the transport network, now and in the future, is as safe and secure as reasonably practicable’*.

A number of the policies within the chapter aim to encourage the use of more sustainable modes of transport particularly cycling (Policy 6.9) and walking (Policy 6.10). The policies will aim to ensure that walking and cycling routes are accessible, safe and convenient. Policy 6.12 (Road network capacity) also places an emphasis on ensuring that when increasing road capacity, the safety of all users should be considered. The policies should therefore have a positive impact upon community safety and security.

There are unlikely to be any other significant effects towards the objective other than those identified above.

Assessment of Chapter 7 (London’s Living Places and Spaces)

Policy 7.1 sets out the strategic direction for building London’s neighbourhoods and communities. We support clause C in Policy 7.1 which states that *‘New development should maximize the opportunity for community diversity, inclusion and cohesion and should contribute to people’s sense of place, safety and security’*.

According to the Metropolitan Police crime figures¹ the number of racist crimes has rose by 4.4% from Aug 2008 to Aug 2009. The number of homophobic crimes also rose 13.8% over the same period. Providing diverse and inclusive communities which are well designed, safe and accessible will therefore help to reduce these types of attacks and have a positive effect upon the community safety objectives.

Policy 7.2 seeks to encourage an inclusive environment through high design standards. These standards will help to ensure that the built environment is safe and accessible to the local community. Policy 7.3 recommends that Boroughs seek to create safe, secure and appropriately accessible environments where crime and disorder and fear of crime do not undermine quality of life or community cohesion.

The Policy states that *‘Development should be consistent with the principles of ‘Secured by Design’, ‘Designing Out Crime’ and ‘Safer Places’. It should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. In particular:*

- *routes and spaces should be legible, overlooked and well maintained*
- *there should be an indication of whether a space is private, semi-public or public, with a mix of uses, where appropriate, to maximize activity throughout the day and night*
- *places, buildings and structures should incorporate features that maximize the security of people and property.*

The above measures should be incorporated at the design stage to ensure that overall design quality is not compromised’.

The key design principles of the various guidance documents seek to ensure that places and buildings incorporate well designed security features and are resilient to vandalism. They also suggest that all spaces should have clear ownership, and be managed in a way that states that the space is cared for. Buildings should be laid out in a way that clearly defines, defends and overlooks private spaces, and should protect public spaces by providing opportunities for casual surveillance and activity. Finally, pedestrian, cyclist and vehicular routes should be well defined and integrated, and limit opportunities for concealment.

By applying these design principles to developments will help to reduce criminal behaviour and provide a sense of security for local residents. The policies will therefore have a positive impact upon community safety.

Policy 7.5 encourages the development of secure and accessible public realms, which are easy to understand and maintain and incorporate the highest quality landscaping, planting, furniture and surfaces.

Policy 7.12 refers to safety, security and resilience to emergency and therefore has immediate and clear beneficial implications for community safety. As well as ensuring the community is safe from fires, flooding and extreme weather, the policy also considers the potential for a terrorist attack. This policy therefore has a positive effect on the community safety objectives.

There are unlikely to be any other significant effects towards the objective other than those identified above.

Appendix E

Iterative Comments and Responses

Below is the record of the iterative process that has helped inform and develop the policies. Suggestions were made by technical experts following consideration of the potential effects to try and make the policies more sustainable.

Chapter	Comment, Query or Recommendation	GLA Response
Intro & Chapter 1 - Context and Strategy		
Vision	Reference to the urban challenges could be included in the policy or within the supporting text (to clarify what they are).	Agree: 'Climate change' is now added to the vision. References to other urban challenges are made throughout the Plan (where appropriate to do so).
Policy 1.1 Delivering the strategic vision and objectives	Consider making reference to quality of life in Policy 1.1.	Agree: Reference to Quality of Life has been added to Policy 1.1
Sustainability Appraisal and Habitats Regulation Assessment	Clarify references to European Directive 2001/42/EC.	Agree: This section has been completely redrafted.
Chapter 2 – London's Places		
Policy 2.3 Growth Areas and Co-ordination Corridors	C, point c: Consider adding reference to adaptation in this point.	Agree. Reference to adaptation has been added to this policy.
Policy 2.9: Inner London	Clarify the role of this policy - is it the vision for Inner London?	Noted: The text has now made this policy clearer. The policy picks out the distinguishing features of inner London – i.e. strong recent growth and deprivation.
Outer London	There are policies for Outer London on the Economy (2.7), Vision and Strategy (2.6) and Transport (2.8). For Inner London there appears to be a number of policies related to the CAZ and Opportunities Areas (policies 2.10 – 2.14) - there is clearly some overlap, but could any of these strategic policies for Outer London be appropriate for Inner London, e.g. presumption against the loss of back gardens, ensuring that the pattern of public service provision and the design and quality of new development enhances communities' sense of place, etc.	Noted: There is now a supporting paragraph on quality of life / environment in inner London.
	When referring to quality of life in Policy 2.6 – consider adding reference to future generations. i.e. <i>'.....by securing a higher quality of life for its present and future residents.'</i>	Agree: This has been amended.

Policy 2.10 (Central Activities Zone – strategic priorities)	This policy makes reference to recognising ‘principle views’. We assume these are the same views as those identified in Section 7.48 (Designated Views).	Noted: The text in this policy has been clarified.
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Chapter 3 – London’s People

Chapter 3 (and more generally)	Use of the term <i>social infrastructure</i> should be reviewed and, if appropriate a definition provided.	Agree: Some changes were made to the use of the term and a definition is provided in the glossary.
Policy 3.2 Addressing Health Inequalities	<p>Policy 3.2 could include reference to the importance of a stable and diverse economy to reducing health inequalities.</p> <p>In D – LDF Guidance, we support the explicit mention of the BPG. Policy 3.2 as currently worded appears to remove the current requirement to conduct a HIA (Policy 3A.23 of the current London Plan) (although we recognise that this is not the intent, consider clarifying this). We note that the policy in the existing London Plan that explicitly requires HIA is leading the way nationally and internationally – so hope this text can be clarified.</p>	<p>Agree: This has now been added.</p> <p>Policy amended to suggest that HIA can be useful tool for major applications and policy now located in People chapter to reflect how it influences across policy themes.</p>
Policy 3.3 Increasing housing supply	<p>Consider removing ‘at least’ from this policy so the numbers are no longer treated as absolute minimums.</p> <p>If ‘at least’ is not removed, then consider requiring higher numbers to be consistent with the principles of sustainable development set out in PPS1 and tested through the sustainability appraisal and HRA.</p>	No: this is derived from a probability based capacity study and there could be more capacity available. The NHPAU also says that we need to address housing affordability and therefore we need to maximise provision.
Connecting poorer areas with opportunity areas:	The designation of growth areas and opportunity areas could positively impact on adjacent poorer neighbourhoods but consider including a specific policy which ensures that there is a way of connecting poorer (deprived) neighbourhoods with the employment opportunities available in the areas of growth and opportunity.	This is now more clearly addressed in the policies.
Policy 3.2, 3.3 ad 3.4	<p>Policy 3.5 – the policy states that the design of new housing should take into account the‘needs of children’.</p> <p>Consider rephrasing this to needs of children and older people.</p> <p>The Policy (3.5) states that ‘<i>Development should be of the highest quality...</i>’. We strongly welcome this on environmental grounds – however, is it possible that the higher costs imposed by achieving the <i>highest</i> standards will result in developments being economically unfeasible? It may not always be feasible ‘to achieve the highest quality’ – consider reflecting the viability of development.</p>	<p>Agree: This text has been amended and now includes reference to the needs of older people.</p> <p>Noted: However, if you add in viability this will undermine the intent of the policy, so no change considered necessary.</p>
Policy 3.10 Mixed and Balanced Communities	Consider revising the last sentence which currently states that ‘ <i>A more balanced mix for tenures should be sought particularly in neighbourhoods where social renting predominates</i> ’ to reflect the need for a more balanced mix of	No: the priority is to tackle concentrations of deprivation and the text does note the need for a wider balance in other areas.

	tenures in all areas (i.e. in areas where social renting <u>does not</u> predominate) – this could be more generalised and based around need and having regard to the mix that is currently there.	
Policy 3.12 Affordable housing targets	A(a). Consider stating that the figure is ' at least xx,xxx more affordable homes' for consistency with the housing numbers set out in Policy 3.3?	Agreed: 'at least' now added to the policy wording.
	Should the number be written as a percentage so that if housing numbers are exceeded – there will be delivery of additional affordable housing?	No: Mechanistic application of a strategic % target does not take account of local circumstances, moreover, in the current market it may constraint overall housing output.
	We acknowledge that achievement of the target should not constrain maximisation of affordable housing (as noted in the supporting text) but we are not sure how this is implemented in practice.	Implementation is described in paragraphs 3.35 to 3.40 and 3.52 to 3.57 of the plan.
	We are unsure how each borough will provide for this – and how the policy will be implemented?	See supporting text.
	Supporting text (under Policy 3.12) states that ' <i>A series of scenarios taking into account historic delivery suggest that 13,200 additional affordable homes per annum can provide the strategic target for the term of the Plan.</i> ' Consider clarifying the importance of <u>historic trends</u> in determining <u>future targets</u> (it may be a self-fulfilling prophecy – if setting targets only accounted for historic trends). We are aware that this is not the case – but suggest clarifying this sentence to reflect this.	Para 3.55 to 3.57 now clarifies this point.
Policy 3.1 Ensuring equal life chances for all	The existing London Plan has a policy addressing the needs of London's diverse population (Policy 3A.17), with the supporting text describing the needs for a number of groups, including disabled Londoners, older people, children and young people, women, BAME, gay men and lesbians, refugees, etc. These groups do not appear to be explicitly identified in Policy 3.1 (Ensuring equal life chances for all) or the supporting text – although there is reference to faith groups in the policy and places of worship in the supporting text (3.34).	Noted: Further justification text added / amended.
	As the policy is about ensuring equal life changes - consider explicitly referencing disadvantaged or socially excluded individual or groups, e.g. by stating that ' <i>Boroughs may wish to identify significant clusters of specific groups such as disadvantaged or socially excluded groups</i> '	Agree: The policy is amended.
	This policy would seem to fit well upfront and should come first where it is given more emphasis.	Noted: This policy is not Policy 3.1.

	Consider clarifying that the requirement for IIA and HIA covers all infrastructure projects (not just social infrastructure projects).	Noted: This is now clarified under Policy 3.2.
Policy 3.17 Protection and enhancement of social infrastructure	The policy text here is in line with the Mayor's duties as stipulated by the GLA Act and refers to <i>health inequalities</i> - but if this text is included within a policy on social infrastructure there is an ambiguity and some may seek to narrow the scope to health services and not consider the wider and more important consideration of <i>health inequalities</i> .	Noted and policy amended.
Supporting paragraphs in Chapter 3.	Distinguish between the terms IIA (as undertaken by the GLA) and Sustainability Appraisal (undertaken by local authorities following guidance issued by the CLG).	Noted: This has been clarified.
	Refer to the Best Practice Guidance (BPG) on Health Issues in Planning.	Noted: A reference to the BPG has been added in Policy 3.2.
	Previous London Plan policy stated that commercial schemes should be open to the public. The new policy states that education and community facilities should be shared. We assume this is the same thing – please clarify if this is intended to result in a practical difference?	Noted and justification text has been amended.
Chapter 4 – London's Economy		
Policy 4.9 Small shops	Welcome this new policy. Consider clarifying 'small' (in a similar way in which 'large retail' is defined).	Definition of 'small' to be determined locally on merits of each case as noted in supporting text.
Policy 4.12 Improving Opportunities for all	We welcome the link to the LDA and the London Skills and Employment Board, but consider a link with the information in para 4.78 which refers to the importance of providing employment opportunities close to those communities in need of local jobs and which also provides a list of ways to tackle the barriers equality target groups face in finding employment.	Agree. Text revised.
Chapter 5 – London's Response to Climate Change		
General	The effects of the policies are clearly very beneficial in terms of the environment (and a number of the IIA objectives). However, consider a general viability clause (similar to that included in the Crossrail policy). This will ensure that particularly in areas of regeneration need development will not be delayed due to stronger requirements for climate change proofing etc (which will result in higher costs).	Noted: It is not clear where this could be inserted and the key policies that set targets are always caveated by the words 'where feasible'.

Policy 5.2 Minimising carbon dioxide emissions	Consider adding a fourth point Offset using “Allowable Solutions” (we appreciate that this is not needed now but is likely to be needed in near the future). Furthermore, does having a zero carbon target <u>imply</u> allowable solutions (as zero carbon may be impossible for very large or tall buildings).	Government is still to define this so it is not refer to at this stage. This may get amended closer to the EiP. It does imply allowable solutions as we will be in line with Government definitions once this is finalised.
Para 5.21	This para states that the targets have been informed by the observed performance of new development since the London Plan was first published... and has been established as achievable and suitable for London. We support the zero carbon target and suggest providing additional evidence to support this.	Noted: The revised policies now reflect this.
Policy 5.4 Retrofitting	This could be extended to include water efficiency measures (covered in Policy 5.15).	Agree: The policy has been revised.
Policy 5.11 Green roofs and development site environs	We welcome this policy (which is similar to the Living Roofs policy in the current Plan). ‘Living roofs and walls’ seemed to be more widely interpreted to include roof terraces and roof gardens. Is the change in wording intentional?	It has been changed to green roofs as this is a more wide spread term in planning, and yes it still includes terraces and gardens.
Policy 5.4 Retrofitting	<p>The policy on retrofitting would benefit from including aims to retrofit adaptation measures to existing housing stock. These adaptations will be required if London is to manage risks of overheating, flood and drought.</p> <p>Consider providing an indication of how the required adaptations to existing buildings could be funded (for example, through payments identified in Policy 5.3).</p>	<p>This is already implied as it applies the principles of Policy 5.3 which covers mitigation and adaptation.</p> <p>This point is too detailed for the plan – consider deleting</p>
Policy 5.10 Urban Greening	The policy states ‘These areas include the CAZ where the surfaces contributing to green infrastructure should be increased b 10%’. Clarify what this 10% increase is on (i.e. what the baseline is)?	Noted: Text is being revised.
Policy 5.15 Water use and supplies	<p>Add reference to the Habitats, Birds and Water Framework Directive in this policy. For example, ‘<i>The Mayor will work in partnership with appropriate agencies within London and adjoining Local Planning Authorities to protect and conserve water supplies and water resources whilst meeting the Habitats, Birds and Water Framework Directives in order to secure London’s needs in a sustainable manner by supporting the Water Strategy...</i>’.</p> <p>Consider adding reference to water cycle studies or requiring LDFs to have regard to water cycle strategies.</p>	<p>Other policies in the plan address this and the plan must be read as one. Furthermore, text has been added to this Policy which ‘<i>that this supply will not give rise to likely significant adverse effects to the designated sites of European importance for nature conservation both alone and in combination with other projects or plans.</i>’</p> <p>We do not believe this is relevant and we do not believe it is necessary to ask boroughs to have regard to such studies.</p>
Chapter 6 – Transport		

Policy 6.13 Parking	<p>Consider adding under LDF Guidance, point d:</p> <ul style="list-style-type: none"> - a lack of existing car parking capacity nearby. <p>Note: We welcome the inclusion of these criteria/caveats which will seek to minimise the negative effects of providing more generous parking standards.</p> <p>Should motorcycle parking provided for in the Plan?</p>	<p>Agree: Policy refined.</p> <p>No, this is not considered to be a strategic issue.</p>
Paragraph in Section 6	<p>The text states that '<i>Developments should provide at least one accessible on or off street car parking bay designated for disabled people, even if no general parking is provided. Any development providing off street parking should provide at least two disabled parking bays</i>'.</p> <p>We welcome this – however, should this text be included within a policy – rather than as supporting text.</p>	<p>Agree: This has been moved from supporting text to Table 6A car parking standards.</p>
Chapter 7 – London's Living Places and Spaces		
Chapter 7 London's Living Places and Spaces	<p>Consider renaming the chapter (from Quality of Life). Having a chapter called Quality of Life as the last chapter seems out of place. Furthermore, the entire Plan is about improving Quality of Life. Therefore, consider renaming the Chapter – or integrating the policies into other chapters.</p>	<p>This Chapter has been renamed to London's Living Places and Spaces</p>
Policy 7.7 (Location and design of tall and large buildings)	<p>This policy is similar to the CABE space/EH guidance for tall buildings (although without the detailed assessment of views, which is included in Policy 7.11).</p> <p>Consider providing guidance on what is considered a 'tall building' (existing Plan defined it as 'significantly taller than their surroundings and / or have a significant impact on the skyline and are larger than the threshold sizes set for the referral of planning applications to the Mayor).</p>	<p>Definition of tall buildings now included in supporting text</p>
Paragraph 7.28	<p>Consider recognising the multicultural aspect of London's history - which can help to promote community cohesion.</p>	<p>Agree: Text has been added.</p>
Policy 7.11 London View Management:	<p>This policy appears to afford the same level of protection as the current plan.</p>	<p>Agree: With additional protection of World heritage sites seen from specific viewpoints</p>
Para 7.20 and 7.20 (street trees)	<p>We welcome the reference in the supporting text to street trees and the reference to incorporating more trees into new proposals in Policy 7.20.</p> <p>Consider specifying that trees should be <i>adaptable and suitable for a changing climate</i> (either in the supporting text or the policy).</p>	<p>Covered by 'right place, right tree'.</p>
Para 7.70 Water Framework Directive	<p>We welcome reference to the Water Framework Directive in the supporting text (7.70). An additional reference could be added in Policy 5.14 (Water quality and sewerage infrastructure) or within the supporting text.</p>	<p>This is not considered to be needed as there is a reference to RBMPs in para 7.57 and Policy 7.23 (Blue Ribbon Network)</p>

Landscape Character Assessments:	Consider adding reference to Borough / District Landscape and Townscape Character Assessments.	Already Covered in Policy 7.4 (Local Character), which has now been strengthened.
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Chapter 8 – Implementation, Monitoring and Review

Table 8.1 Key Performance Indicators:	The health indicator should cover health protection and importantly health improvement, physical and mental health and inequalities – it should be relevant to the activities of the Plan (not easy). As this is developed/trialled we suggest that the Plan includes a proxy indicator e.g. number of links between NHS organisations and planning authorities, number of HIAs conducted on development proposals.	Agree that there needs to be a health indicator – the aim is to have an indicator that relates more closely to the ability of the planning system to deliver.
	Consider cycle lane provision, cycle parking facilities, changing facilities etc.	Disagree, too detailed and difficult to measure. KPI16 is target on cycling a % of total trips will be included.
	Consider number of trees planted.	Will consider as long as reliable monitoring is in place.

Appendix F Quality Assurance Checklist

Quality Assurance Checklist	
Objectives and Context	
The plan's purpose and objectives are made clear.	Section 2
Sustainability issues, including international and EC objectives, are considered in developing objectives and targets.	Sustainability issues relevant to London are identified in Section 3.3 . International, European, UK and regional objectives and targets have been identified in from the Plans and programmes listed in Appendix G and in the Scoping Report.
SEA Objectives are clearly set out and linked to indicators and targets where appropriate.	Section 3.4 presents the IIA objectives.
Links to other related plans, programmes and policies are identified and explained.	Appendix G identifies a number of relevant plans and programmes.
Scoping	
The environmental consultation bodies are consulted in appropriate ways and at appropriate times on the content and scope of the Scoping Report.	The consultation on the Scoping Report ran for 5 weeks from 21 st May 2009 to 30 th June 2009. A scoping workshop was held in City Hall in June 2009, to which the statutory SEA and non-statutory bodies were invited.
The SEA focuses on significant issues.	Significant issues were identified in the Scoping Report and were reiterated in Section 3.4 of this IIA Report.
Technical, procedural and other difficulties encountered are discussed; assumptions and uncertainties are made explicit.	These were stated throughout the Scoping Report where appropriate and are presented in Section 3.7 of this IIA Report.
Reasons are given for eliminating issues from further consideration.	These are stated in the Scoping Report where appropriate and in Section 3.2 of the IIA Report.
Alternatives	
Realistic alternatives are considered for key issues and the reasons for choosing them are documented.	Alternatives are identified in Section 5 and 6 .
Alternatives include 'do minimum' and/or 'business as usual' scenarios wherever relevant.	These were considered in Section 5 and 6 .
The environmental effects (both adverse and beneficial) of each alternative are identified and compared.	These are included in Section 5 and 6 .

Inconsistencies between the alternatives and other relevant plans, programmes or policies are identified and explained.	Refer to Section 5 and 6 and Appendix G .
Reasons are given for the selection or elimination of alternatives.	These are presented in Section 5 and 6 .
Baseline Information	
Relevant aspects of the current state of the environment and their likely evolution without the plan are described.	This is set out in Section 3.3 , Sections 4 – 11 and Appendix H .
Characteristics of areas likely to be significantly affected are described, including areas wider than the physical boundary of the plan area where it is likely to be affected by the plan where practical.	This is set out in Section 3.3 and Sections 4 – 11 .
Any difficulties, such as deficiencies in information or methods, are explained.	Technical difficulties are set out in Section 3.7 and are stated through the IIA Report where appropriate.
Prediction and Evaluation of Significant Environmental Effects	
Effects identified include the types listed in the Directive (biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage and landscape) as relevant; other likely environmental effects are also covered as appropriate.	Sections 4 – 11 and Appendix B and C .
Both positive and negative effects are considered and the duration of effects (short, medium or long term) is addressed,	Sections 4 – 11 and Appendix B and C .
Likely secondary, cumulative and synergistic effects are identified where practicable.	Sections 4 – 11 and Appendix B and C .
Inter-relationships between effects are considered where practicable.	Sections 4 – 11 and Appendix B and C .
The prediction and evaluation of effects makes use of relevant accepted standards, regulations and thresholds.	These are considered /referenced within this IIA Report where appropriate and are noted in Section 3.5 and Section 3.7 .
Methods used to evaluate the effects are described.	This is set out in Section 3 and within the Scoping Report.
Mitigation Measures	
Measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the plan or programme are indicated.	These are set out in Section 5.2 .
Issues to be taken into account in project consents are identified.	These are considered in Sections 4 – 11 where relevant.
Environmental Report	
Is clear and concise in its layout and presentation	The purpose of the IIA Report is set out in Section 1.2 .
Uses simple, clear language and avoids or explains technical terms.	Abbreviations have been presented in Appendix A and technical terms are explained throughout.

Uses maps and other illustrations where appropriate.	Figures and tables have been used where appropriate.
Explains the methodology used.	This is presented in Section 3 .
Explains who was consulted and the methods of consultation used.	This is set out in Section 1.5, 1.6 and Section 5.5 .
Identifies sources of information, including expert judgement and matters of opinion.	This is covered in Section 3.6 .
Contains a non-technical summary covering the overall approach to the SEA, the objectives of the plan, the main options considered and any changes to the plan resulting from the SEA.	An NTS is provided at the front of the IIA Report and as a stand alone document.
Consultation	
The SEA is consulted on as an integral part of the plan-making process.	Consultation has already taken place on the Scoping Report in May and June 2009. Consultation of the IIA Report will be along side the London Plan Replacement for 12 weeks.
Consultation Bodies and the public likely to be affected by, or having an interest in, the plan or programme are consulted in ways and at times which give them an early and effective opportunity within appropriate timeframes to express their opinions on the draft plan and Environmental Report.	Stakeholders have been kept engaged throughout the report's preparation and comments have been sought during designated consultation periods and workshops.
Decision-making and Information on the Decision	
The Environmental Report (IIA Report) and the opinions of those consulted are taken into account in finalising and adopting the plan or programme.	This will be included in the Post Adoption Statement (to be issued following consultation).
An explanation is given of how they have been taken into account.	This will be included in the Post Adoption Statement (to be issued following consultation).
Reasons are given for choosing the plan or programme as adopted in light of other reasonable alternatives considered.	This will be included in the Post Adoption Statement (to be issued following consultation).
Monitoring Measures	
Measures proposed for monitoring are clear, practicable and linked to the indicators and objectives used in the SEA.	These are presented in Section 12.2 .
Monitoring is used, where appropriate, during implementation of the plan or programme, to make good deficiencies in baseline information in the SEA.	Details of this are provided in Section 12.2 .
Monitoring enables unforeseen adverse effects to be identified at an early stage (these effects may include predictions which prove to be incorrect).	Details of this are provided in Section 12.2 .
Proposals are made for action in response to significant adverse effects.	These are considered in Section 12.2 . They will also be set out in the Post Adoption Statement (to be issued following consultation).

